

No. 24-2815

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

THE GEO GROUP, INC.,

Plaintiff-Appellee,

v.

JAY R. INSLEE, in his official capacity as Governor of the State of Washington;
and ROBERT W. FERGUSON, in his official capacity as Attorney General of the
State of Washington,

Defendants-Appellants.

On Appeal from the United States District Court for the
Western District of Washington
Civil Case No. 3:23-cv-05626-BHS
(Honorable Benjamin H. Settle)

**BRIEF OF LA RESISTENCIA AND
PROF. ANGELINA SNODGRASS GODOY AS AMICI CURIAE IN
SUPPORT OF APPELLANTS**

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I. CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rules of Appellate Procedure 26.1 and 29(a)(4)(A), undersigned counsel for amici curiae makes the following disclosures. La Resistencia and Professor Angelina Snodgrass Godoy are not publicly held corporations, do not issue stock, and do not have parent corporations. Consequently, there exist no publicly held corporations which own 10 percent or more of their stock.

II. STATEMENT REGARDING CONSENT TO FILE

Undersigned counsel certifies that the parties have consented to the filing of the amicus brief pursuant to FRAP 29(a)(2).

III. FRAP 29 STATEMENT

Amici certify that, pursuant to Federal Rules of Appellate Procedure 29(a)(4)(E), no party's counsel authored this brief in whole or in part, nor did any party or party's counsel contribute money that was intended to fund preparing or submitting this brief. No person—other than the amici curiae, their members, or their counsel—contributed money that was intended to fund preparing or submitting this brief.

IV. STATEMENT OF INTEREST

La Resistencia and Professor Angelina Snodgrass Godoy (collectively, "Amici") respectfully submit this brief in support of Defendants – Appellants.

La Resistencia is a grassroots, volunteer-based group founded in March 2014 when people detained at Northwest ICE Processing Center (NWIPC) reached out to volunteers for support as they began the largest hunger strike to ever take place in an immigration detention center. La Resistencia is led by people with direct experience of the detention and deportation system in Washington State. La Resistencia maintains daily communication with people in detention through a phone hotline, emails, visits, and public demonstrations. La Resistencia receives complaints related to health and safety from people detained at NWIPC and regularly transmits a complaint log to the state Department of Health team responsible for implementing House Bill 1470. By following the leadership and experience of those detained, La Resistencia shines a spotlight on the daily inhumane detention conditions at NWIPC.

Angelina Snodgrass Godoy, Ph.D., is the Helen H. Jackson Chair in Human Rights and Director of the University of Washington Center for Human Rights (UWCHR), where she is a tenured member of the faculty appointed in International Studies and Law, Societies and Justice. A sociologist by training, Prof. Godoy is the author of two books published by Stanford University Press, as well as multiple peer-reviewed articles on human rights topics. She is the principal author of UWCHR's reports on detention conditions at NWIPC.

Amici believe that the Court in this matter would benefit from La Resistencia's perspective from working on the ground with people detained in NWIPC, including people who have experienced conditions deleterious to their health and safety while detained in the facility. Prof. Godoy is an expert in obtaining and analyzing government documents to ascertain human rights violations and is particularly versed in the challenges of using institutional documentation to corroborate victim complaints. Specifically, she has reviewed thousands of pages of complaints from people detained at NWIPC; The GEO Group, Inc. (GEO) and U.S. Immigration and Customs Enforcement (ICE) responses; and audit reports obtained through the Freedom of Information Act (FOIA). Prof. Godoy also reviewed records obtained from Pierce County South Sound 911 pursuant to public records requests filed by UWCHR for dispatch reports and audio for calls originating at NWIPC.

Amici respectfully submit that their shared experience and efforts to expose the abusive environment within NWIPC give this Court a unique perspective that cannot be provided by the parties. Due to GEO's efforts to prevent access to the facility by state officials, concerned groups like Amici must resort to informal systems like in-person interviews, phone calls, letters, and newspaper articles to document the experiences of people detained in NWIPC and to help make their

plight known. Based on these accounts, Amici have grave concerns for the health, safety, and welfare of all people detained in NWIPC.

V. ARGUMENT

A. The balance of equities and public interest in protecting the health and safety of people in detention tip sharply in favor of state oversight of for-profit detention facilities.

GEO is a private, for-profit company that operates NWIPC—and reaps enormous profits from confining people there. In 2023, GEO made \$2.41 billion in revenue and had a net income of \$113.8 million.¹ GEO profits between \$18 million and \$20 million per year by operating NWIPC.²

GEO has failed to show that the public interest and the balance of equities favor a preliminary injunction against enforcement of House Bill 1470 (HB 1470). This Court’s precedent is clear: “[f]aced with . . . a conflict between financial concerns and preventable human suffering, [courts] have little difficulty concluding that the balance of hardships tips decidedly in . . . favor” of avoiding “physical and emotional suffering.”³ The fact that GEO’s primary motivation is profit leads to a lack of accountability in maintaining minimum standards of health and safety. This results in dangerous conditions within NWIPC.

¹ The GEO Group Reports Fourth Quarter and Full Year 2023 Results, The GEO Group, Inc. (Feb. 15, 2024), <https://investors.geogroup.com/news-releases/news-release-details/geo-group-reports-fourth-quarter-and-full-year-2023-results>.

² App. 1 at 3-4.

³ *Lopez v. Heckler*, 713 F.2d 1432, 1437 (9th Cir. 1983).

Amici are concerned that NWIPC is engaged in cost-cutting practices that endanger people in custody; deny people basic nutrition and hygiene; neglect medical and mental health concerns, resulting in serious injury or death; and use solitary confinement to retaliate against people who speak out against deplorable conditions. Amici are concerned that they will continue to receive calls, letters, and other reports from people detained in NWIPC detailing irreparable harm if the preliminary injunction is not lifted and the Department of Health (DOH) continues to be denied the ability to investigate these escalating health and safety concerns.

GEO's argument that it will suffer irreparable monetary harm in the form of "burdensome and expensive physical and operational changes" to NWIPC is speculative.⁴ The rulemaking process for HB 1470 has just started and will not conclude for months (or longer), and GEO may participate as a stakeholder in that process. Conversely, based on reports received by Amici from people detained in NWIPC, Amici believe the threat of harm and potential loss of life is immediate. One person died in solitary confinement in NWIPC one day before the district court ordered the injunction.⁵ At least six others have attempted suicide since the

⁴ Pl's. Tr. Br. at 23.

⁵ NWDC Conditions Research Update: Charles Leo Daniel's Death at NWDC in Context, Univ. of Wash. Ctr. for Hum. Rts. (Mar. 15, 2024), <https://jsis.washington.edu/humanrights/2024/03/15/nwdc-conditions-research-update-daniel-death-in-context/>. Fiscal year 2024 has had more than double the number of deaths in ICE-contracted detention compared to all of last year. See

injunction went into effect.⁶ Meanwhile, GEO has turned state health inspectors away. The State's interest in preserving human life and preventing needless suffering for people held within NWIPC greatly outweighs GEO's interest in maintaining its profit margins in the face of speculative future costs.

1. For-profit, private detention facilities are not subject to oversight like public prisons, and their interest in maximizing profits leads to heightened health and safety risks for people in custody.

In passing HB 1470, the Washington Legislature recognized “that private prisons and detention centers are less accountable for what happens inside those facilities than state-run facilities.”⁷ Because most for-profit detention facilities (including NWIPC) are not covered by public records laws and refuse to cooperate with records requests, the public cannot access information about health and safety

also, Daniella Silva, The Number of Deaths in ICE Custody is Already More than Double All of Last Year, NBC News (June 1, 2024), <https://www.nbcnews.com/news/us-news/number-deaths-ice-custody-already-double-last-year-rcna154659>.

⁶ Nina Shapiro, At Least 6 Suicide Attempts at Tacoma ICE Facility, 911 Calls Show, The Seattle Times (Apr. 10, 2024), <https://www.seattletimes.com/seattle-news/law-justice/at-least-6-suicide-attempts-at-tacoma-ice-facility-911-calls-show/>. Other reports indicate that there have been nine attempted suicides at the NWIPC this year. See Marco Vinicio González, Salvadoreño intenta suicidarse por miedo a ser deportado a El Salvador, Radio Bilingüe (May 22, 2024), <https://radiobilngue.org/es/news/salvadoreno-intenta-suicidarse-por-miedo-a-ser-deportado-a-el-salvador>.

⁷ RCW 70.395.010(5).

conditions when abuses occur.⁸ To make matters worse, federally-contracted inspections of for-profit detention facilities—like NWIPC—are effectively meaningless.⁹ Effective oversight simply does not exist when it comes to for-profit facilities, leading to near lawlessness.¹⁰

a. For-profit, private detention facilities utilize cost-cutting measures that directly lead to inhumane conditions for people in custody.

For-profit detention companies like GEO follow a business model that relies on keeping costs down, which they achieve by cutting corners on basic services like food, hygiene, medical care, and staffing and training costs.¹¹ Specifically, these practices include cost-saving measures such as failing to hire sufficient staff to ensure the safety of people detained; failing to hire a sufficient number of health

⁸ See Lauren-Brooke Eisen, Private Prisons Lock Up Thousands Of Americans With Almost No Oversight, The Brennan Ctr. for Just. (Nov. 8, 2017), <https://www.brennancenter.org/our-work/analysis-opinion/private-prisons-lock-thousands-americans-almost-no-oversight>; See also UWCHR Project Updates 2020-2021, Univ. of Wash. Ctr. for Hum. Rts. (Oct. 29, 2021), <https://jsis.washington.edu/humanrights/2021/10/29/uwchr-project-updates-2020-2021/>.

⁹ ICE's Inspections and Monitoring of Detention Facilities Do Not Lead to Sustained Compliance or Systemic Improvements, U.S. DHS, Off. of the Inspector Gen., at 7-8; fn.12 (July 26, 2018), <https://www.oig.dhs.gov/sites/default/files/assets/2018-06/OIG-18-67-Jun18.pdf> (inspections conducted by private contractors are “useless” and “very, very, very difficult to fail.”)

¹⁰ Eisen, *supra* note 8.

¹¹ Cutting Corners in America's Criminal Justice System, In the Public Interest (April 2016), https://www.inthepublicinterest.org/wp-content/uploads/ITPI_CuttingCorners_Corrections_April2016.pdf

care professionals to provide for detained individuals' medical needs; reducing trainings for staff; neglecting facility maintenance and equipment; and lowering the quality and healthiness of food.¹² While these cost-cutting measures increase profit, they also significantly increase the risk of physical violence and danger; decrease the availability of nutrition, sanitation, and hygiene; decrease access to medical and mental health care; and increase abuse of solitary confinement.

i. For-profit detention facilities place people at an increased risk of physical violence and danger.

For-profit detention facilities have higher rates of violence than public prisons.¹³ Understaffing, low pay, and lack of training for staff in private, for-profit facilities contribute to dangerous conditions.¹⁴ The U.S. Department of Justice (DOJ), Office of the Inspector General found that privately-operated “contract prisons incurred more safety and security incidents per capita than comparable [Bureau of Prisons] institutions” and had “higher rates of assaults, both by inmates on other inmates and by inmates on staff.”¹⁵ In 2016, the DOJ announced plans to end use of for-profit facilities, stating that they “compare poorly to our own Bureau facilities. They simply do not provide the same level of correctional services,

¹² *Id.*

¹³ Review of the Federal Bureau of Prisons' Monitoring of Contract Prisons, U.S. DOJ, Off. of the Inspector Gen., at ii (Aug. 2016), <https://www.oversight.gov/sites/default/files/oig-reports/e1606.pdf>.

¹⁴ Cutting Corners, *supra* note 11.

¹⁵ Review of the Federal BOP, *supra* note 13 at ii.

programs, and resources ... and ... they do not maintain the same level of safety and security.”¹⁶

ii. *For-profit detention facilities fail to provide people with adequate nutrition, sanitation, and hygiene.*

Cutting corners on the quality and quantity of food served to people in detention is one of the most common ways that for-profit detention companies reduce facility costs.¹⁷ Sanitation and hygiene conditions also suffer when facilities reduce costs.¹⁸

¹⁶ Sally Q. Yates, Memorandum: Reducing our Use of Private Prisons, U.S. DOJ, Off. of the Dep. Attorney Gen. (Aug. 18, 2016), <https://www.justice.gov/opa/file/886311/d1>. BOP’s last contract with a private facility ended on November 30, 2022. See also, BOP Ends Use of Privately Owned Prisons, Fed. Bureau of Prisons (Dec. 1, 2022), https://www.bop.gov/resources/news/20221201_ends_use_of_privately_owned_prisons.jsp.

¹⁷ Cutting Corners, *supra* note 11. See also Tony Vick, The Private Prisons Industry Is Changing What Constitutes “Food”, Filter (Apr. 4, 2024), <https://filtermag.org/private-prisons-food/>; Natalie Delgadillo, Maggots With a Side of Dirt? What Privatization Does to Prison Food, Governing (Jan. 26, 2018), <https://www.governing.com/archive/gov-private-food-service-prisons-aramark-trinity-ohio-michigan.html>.

¹⁸ Cutting Corners, *supra* note 11 at 4-5. See also Leila Fadel and Tom Dreisbach, NPR Investigation Reveals Significant Failures at Immigrant Detention Facilities, NPR (Aug. 16, 2023), <https://www.npr.org/2023/08/16/1194115251/npr-investigation-reveals-significant-failures-at-immigrant-detention-facilities/>; US: New Report Shines Spotlight on Abuses and Growth in Immigrant Detention Under Trump, Human Rights Watch (Apr. 30, 2020), <https://www.hrw.org/news/2020/04/30/us-new-report-shines-spotlight-abuses-and-growth-immigrant-detention-under-trump>.

iii. *For-profit detention facilities fail to provide people with adequate medical and mental health care.*

Private, for-profit detention facilities are notorious for their failure to provide adequate medical and mental health care. Recent investigative reporting by *The Nation* revealed over two dozen deaths involving substandard medical care and widespread medical negligence within federal Bureau of Prisons (BOP)-contracted private facilities.¹⁹ *The Nation* report found that “private contractors consistently failed to provide baseline levels of care to patients sick with cancer, mental illness and AIDS and other infectious diseases.”²⁰ In addition, the “medical units were gravely understaffed,” medical staff lacked necessary training, and delayed or denied care was rampant, as those “who complained of illness went months at a time without seeing a medical doctor, their health declining until their premature death.”²¹

iv. *For-profit detention facilities notoriously misuse solitary confinement.*

For-profit facilities have a track record of holding people in isolation for extended periods of time and for inappropriate reasons.²² Prolonged solitary

¹⁹ Seth Freed Wessler, [The Justice Department Will End All Federal Private Prisons, Following a ‘Nation’ Investigation](https://www.thenation.com/article/archive/justice-department-to-end-all-federal-private-prisons-following-nation-investigation/), *The Nation* (Aug. 18, 2016), <https://www.thenation.com/article/archive/justice-department-to-end-all-federal-private-prisons-following-nation-investigation/>.

²⁰ Id.

²¹ Id.

²² [Review of the Federal BOP](#), *supra* note 13 at ii-iii; 29-30. See also [Endless Nightmare](#), Physicians for Hum. Rts., fn. 79 (Feb. 6, 2024),

confinement—with the social isolation, sensory deprivation, and forced idleness that such confinement entails—causes serious psychological harm, including anxiety; depression; post-traumatic stress disorder (PTSD); loss of identity; and psychosis, with an accompanying increased risk of self-harm and suicide.²³ The mental stress of isolation may also lead to physical problems, such as hypertension, heart attacks, and strokes.²⁴

The U.S. Department of Homeland Security, Office of the Inspector General (DHS OIG) documented “inappropriate segregation practices” at for-profit detention facilities that “infringe on detainee rights.”²⁵ The Department of

<https://phr.org/our-work/resources/endless-nightmare-solitary-confinement-in-us-immigration-detention/> (for-profit corporations operate all five of the ICE-contracted facilities with the longest periods of solitary confinement, with the average length of stay lasting 27 days; GEO Group operates 2 of those facilities).

²³ Kayla James and Elena Vanko, The Impacts of Solitary Confinement, Vera.org (April 2021), <https://www.vera.org/downloads/publications/the-impacts-of-solitary-confinement.pdf> (“the longer social isolation lasts, the more likely it is to cause lasting neurological damage”); see also G.A. Res. 70/175 (Dec. 17, 2015) available at

<https://undocs.org/Home/Mobile?FinalSymbol=A%2FRES%2F70%2F175&Language=E&DeviceType=Desktop&LangRequested=False> (recognizing solitary confinement as a form of torture).

²⁴ James and Vanko, *supra* note 23.

²⁵ Concerns about ICE Detainee Treatment and Care at Four Detention Facilities, U.S. DHS, Off. of the Inspector Gen., at 2, 5 (June 3, 2019),

<https://www.oig.dhs.gov/sites/default/files/assets/2019-06/OIG-19-47-Jun19.pdf>. GEO owns and operates two of the three facilities flagged by DHS OIG for improper segregation practices, both of which are for-profit (the Adelanto ICE Processing Center in California and the Aurora ICE Processing Center in Colorado).

Homeland Security's Office for Civil Rights and Civil Liberties (CRCL) documented significant complaints regarding people with serious mental health conditions held in solitary confinement in ICE-contracted facilities, including that people in detention were denied adequate mental health care and placed in segregation as a form of "treatment," and that people were reluctant to report suicidal ideation and mental health concerns because they feared being placed in solitary confinement.²⁶

b. For these reasons, public prisons are an inappropriate comparator to for-profit detention facilities.

Washington State's public prisons and jails are not an appropriate comparator for NWIPC. Accordingly, this Court should look at other for-profit, private facilities as comparators to NWIPC. To be clear, pervasive health and safety issues exist within Washington's state prison system. Incarceration following a criminal conviction is built on the flawed premise that rehabilitation can be achieved by separating human beings from their families and communities and confining them in a restrictive, punitive setting. However, facilities operated by companies with a profit motive are built on an even more flawed premise: that

²⁶ Dana Salvano-Dunn, Retention Memo: Segregation of Individuals with a Mental Health Disability and/or Serious Mental Illness, U.S. DHS Office for Civ. Rts. and Civ. Liberties (Sept. 1, 2023), https://www.dhs.gov/sites/default/files/2023-09/23_0901_crcl_retention_memo_to_ice_segregation_mental_health_or_illness_redacted_508.pdf.

these companies can maintain minimum standards of care despite their competing fiduciary duties to increase profits for their shareholders.

2. NWIPC, a for-profit, private detention facility in Washington State, presents the same risks of harm to people in its custody as seen in other comparable private, for-profit facilities.

Amici regularly receive phone calls, letters, and other reports from people at NWIPC regarding the inhumane conditions at the facility. Despite having an internal system to grieve conditions issues, grievances submitted by people detained in NWIPC invariably go unanswered.²⁷ Amici have made efforts to track grievance information that they receive from people in custody at NWIPC.²⁸ Without the oversight envisioned by HB 1470, Amici will continue to receive reports of dangerous, inhumane conditions within NWIPC, without any meaningful process for documentation, oversight, or accountability.

a. NWIPC exposes people to danger and violence.

People detained in NWIPC reported to La Resistencia that staff use excessive force. “[T]he guards don’t know how to handle the detainees, they use

²⁷ Conditions at the NWDC: Sanitation of Food & Laundry, Univ. of Wash. Ctr. for Hum. Rts. (Mar. 27, 2020), <https://jsis.washington.edu/humanrights/2020/03/27/nwdc-sanitation-of-food-laundry/> (“[R]esponses by staff reviewing grievances … show that these concerns are often dismissed by the facility, which either deems them ‘not a grievance’ or suggests the detained person must approach the other institution (ICE or GEO) for resolution.”)

²⁸ See App. 2.

too much force and abuse them.”²⁹ Another individual reported, “I’ve been badly assaulted and brutalized by GEO guards”³⁰ and “I can’t sleep at night anymore. I see myself getting beaten up when I close my eyes.”³¹

Sexual assaults are also a major problem within the facility.³² La Resistencia received a report from a person in detention that “a GEO officer put his hand inside [a woman’s] pants and touched her parts.”³³ Another report described how “they threatened her [a person in custody] for complaining that the guards were harassing a ‘pretty and shapely’ woman, told her it was just gossip, … and threatened her with going to the hole.”³⁴

Based on reports from people detained in NWIPC, groups like La Resistencia, Global Rights Advocacy, and the Seattle University School of Law have raised concerns with the Inter-American Commission on Human Rights (IACHR).³⁵ Statements like the following motivated these groups to seek

²⁹ App. 2, Ex. A at row 285. See also rows 69; 71-72; 218; 286; 289.

³⁰ Id. at row 71.

³¹ Id. at row 72.

³² Id. at row 5; 159; 244; 251. See also Conditions at the NWDC: Reporting of Sexual Abuse and Assault, Univ. of Wash Ctr. for Hum. Rts. (May 16, 2022), <https://jsis.washington.edu/humanrights/2022/05/16/nwdc-assault-abuse-reporting/>.

³³ App. 2, Ex. A at row 294.

³⁴ Id. at row 179. The “hole” is a term commonly used to refer to solitary confinement.

³⁵ App. 3. Exs. B; C. Amici ask the court to take judicial notice of the fact that these letters were sent to the IACHR, not for the truth of the statements themselves, but for the alarm that such statements caused Amici.

assistance from the IACtHR: “I am in a unit that makes me feel unsafe, especially at night,”³⁶ and “I asked to be placed in solitary confinement for my own safety since GEO said that there was no way to prevent attacks... They have forced me to choose between two different things, my personal security or my mental health.”³⁷

NWIPC staff are woefully unprepared to deal with medical crises and other emergencies. In April 2024, a person reported to La Resistencia, “I went to [the] washroom last night and I passed out and I hit my head on the floor and it ... spilled so much blood and ... I was on the floor for half an hour ... one of the detainee[s] helped me to wake me up... And the nurses they were standing there watching me but were not doing anything to help and after that they took me to hospital after 2 hours.”³⁸ During a recent fire in NWIPC, people reported to La Resistencia that “during the fire they were not taken out of the unit, many were coughing, they have no evacuation protocols.”³⁹

NWIPC staff’s inability to respond to emergencies is particularly troubling when responding to incidents of self-harm. Pierce County’s South Sound 911 released dispatch logs and audio related to six reported suicide attempts and an

³⁶ App. 3, Ex. B at 49.

³⁷ App. 3, Ex. C at 56-57.

³⁸ App. 2, Ex. A at row 224.

³⁹ App. 2, Ex. A at row 132. See rows 143; 174; 186. See also, Craig Sailor, Fire Reported at Immigrant Detention Center in Tacoma -- Crews Respond to Scene, The Tacoma News Tribune (Mar. 15, 2024), <https://www.thenewstribune.com/news/local/article286717260.html>.

additional report of significant self-harm by people detained in NWIPC.⁴⁰ The UWCHR reports that, “[i]n a chaotic March 13 call requesting medical response for a suicide attempt, detention center staff describe a detained person as ‘breathing but not conscious’; in a follow up call by Tacoma Police Dispatch less than fifteen minutes later, detention center staff report that the incident is being handled ‘in-house’ and does not require police response.”⁴¹ The 911 recordings include harrowing details of one woman attempting suicide by asphyxiation on two occasions, and two incidents involving people detained jumping or falling from the facility’s second tier.⁴²

La Resistencia also received reports that NWIPC staff did not provide immediate medical attention to individuals who had attempted suicide. “When the incident happened, with the person hanging himself, instead of the medics arriving, the GEO guards arrived, more than 10 of them, pushing, shoving, … threatening and beating.”⁴³ On March 13, 2024, another person reported, “[a]nother detainee in my unit … just tr[ied] to commit suicide by hanging … through the rail upstairs

⁴⁰ Press Release: 911 Calls Reveal Suicide Attempts at NWDC, Univ. of Wash. Ctr. for Hum. Rts. (Apr. 9. 2024), <https://jsis.washington.edu/humanrights/2024/04/09/press-release-911-calls-reveal-suicide-attempts-at-nwdc/>. The UWCHR obtained the records pursuant to a public records request.

⁴¹ *Id.*

⁴² *Id.*

⁴³ App. 2, Ex. A at row 105.

but unfortunately he fell off from the top tier almost 10 feet to the floor. He was unresponsive for ... almost 40 minutes before the ambulance came and took him out. ... The medical [staff] came but couldn't do anything because they claim that they don't have professionals to help the detainee [until] the ambulance came.”⁴⁴

The UWCHR found that the rate of reported suicide attempts at NWIPC increased in 2024.⁴⁵

b. GEO fails to provide individuals with basic nutrition, hygiene, and clean laundry.

Reports by UWCHR document abysmal conditions at NWIPC related to improper sanitation, poor nutrition, and lack of clean laundry and basic hygiene necessities.⁴⁶ Recent reports made by people detained to La Resistencia further illustrate these horrendous conditions.

i. GEO fails to provide adequate nutrition for people in custody.

La Resistencia has received numerous reports from people detained in NWIPC that food is routinely served cold, is served at unpredictable intervals (including late into the night), and tastes so bad that many individuals are unable to eat it.⁴⁷ Other reports detail that food is often spoiled, raw or undercooked, or

⁴⁴ Id. at row 125.

⁴⁵ Press Release: 911 Calls, *supra* note 40.

⁴⁶ Conditions at the Northwest Detention Center, Univ. of Wash. Ctr. for Hum. Rts. <https://jsis.washington.edu/humanrights/projects/human-rights-at-home/conditions-at-the-northwest-detention-center/> (last visited June 4, 2024).

⁴⁷ App. 2, Ex. A at rows 35; 59-60; 74; 95; 149; 175; 181; 200.

served past its expiration date.⁴⁸ Several individuals reported finding rocks and plastic in their food.⁴⁹ DHS OIG has found that “[NWIPC] had an incomplete food inventory control system and did not always practice sound food storage practices.”⁵⁰

Issues around inadequate nutrition and delivery of meals have significant health consequences for people at NWIPC. There are reports of GEO failing to provide adequate accommodations for people with severe food allergies, causing them to choose between becoming ill or going hungry. “He is allergic to onions and has test results showing this, but he keeps receiving food with onions and sometimes he goes days without eating.”⁵¹ Furthermore, it is often difficult for individuals who have been prescribed medications to follow their proper medication schedule because the food that they need to take with their medicine is not delivered on time, causing harmful side effects.⁵²

⁴⁸ Id. at rows 60; 175; 200; 250; 279; 284; 288.

⁴⁹ Id. at rows 100; 206.

⁵⁰ Results of an Unannounced Inspection of Northwest ICE Processing Center in Tacoma, Washington, U.S. DHS Off. of the Inspector Gen. (May 22, 2023), <https://www.oig.dhs.gov/sites/default/files/assets/2023-05/OIG-23-26-May23.pdf>

⁵¹ App. 2, Ex. A at row 85. See also row 41.

⁵² Id. at rows 54-55.

ii. *GEO fails to provide individuals with basic hygiene and clean laundry.*

Cleanliness within NWIPC deteriorated drastically following a federal jury decision that GEO must pay detained workers the Washington state minimum wage, to which GEO responded by ending its work program for detained individuals.⁵³ Prior to that decision, GEO paid people in detention one dollar per day to clean the facility.⁵⁴ At trial in that case, NWIPC's business manager testified that paying GEO officers and other staff to do the work performed by detained workers would reduce company profit.⁵⁵ As of March 2024, people detained in NWIPC report that they are "now unable to have access to cleaning supplies to clean their own units and common spaces which is having detrimental effects on the cleanliness and hygiene of the facility."⁵⁶

La Resistencia frequently receives complaints about the shoddiness of the cleaning, with many reporting that the cleaners used to clean twice daily but now clean only once daily when they do show up, and that the cleaning itself is

⁵³ Gene Johnson, [GEO Group Halts Work Program at Tacoma Jail Instead of Upping Detainee Pay](https://www.knkx.org/law/2021-11-05/geo-group-halts-work-program-at-tacoma-jail-instead-of-upping-detainee-pay), KNKX.org (Nov. 5, 2021), <https://www.knkx.org/law/2021-11-05/geo-group-halts-work-program-at-tacoma-jail-instead-of-upping-detainee-pay>. See also Lilly Ana Fowler, [Immigrants Speak Out About Conditions After Suspension of Worker Program at Tacoma ICE Facility](https://www.knkx.org/social-justice/2021-12-30/immigrants-speak-out-about-conditions-after-suspension-of-worker-program-at-tacoma-ice-facility), KNKX.org (Dec. 30, 2021), <https://www.knkx.org/social-justice/2021-12-30/immigrants-speak-out-about-conditions-after-suspension-of-worker-program-at-tacoma-ice-facility>.

⁵⁴ Fowler, *supra* at note 53.

⁵⁵ App. 1 at 3-4.

⁵⁶ App. 3, Ex. B at 40.

inadequate.⁵⁷ In January 2024, an individual reported, “I told them [GEO] to call the cleaners to come and clean yesterday and they said they have no cleaners.”⁵⁸ In February 2024, another individual reported that “the cleaners only come once a day now with only 2 or 3 workers doing a quick and superficial cleaning.”⁵⁹ Meanwhile, people in detention report the presence of mold in the bathrooms.⁶⁰

Another common complaint is that the toilets in the units become clogged and are not fixed for long periods of time.⁶¹ In January 2024, this resulted in one unit having only one working toilet for 40 people.⁶² Later that month, another person reported that half the toilets in his unit had been clogged for 15 days, leaving only two working toilets for over 40 people.⁶³

People also report to La Resistencia that access to clothing, towels, and bed linens is severely limited, and laundry is done at unpredictable intervals without sufficient detergent, forcing people to wear dirty clothing and sleep in dirty bedding.⁶⁴ In January 2024, a person reported that “because they don’t have workers in the laundry, they cannot give new underwear, they do not have enough

⁵⁷ App. 2, Ex. A at row 7-8; 21; 64; 76; 238; 259; 300.

⁵⁸ Id. at row 6.

⁵⁹ Id. at row 62.

⁶⁰ Id. at row 48.

⁶¹ Id. at rows 43; 81.

⁶² Id. at row 6.

⁶³ Id. at row 25.

⁶⁴ Id. at rows 61; 78; 110; 131; 135; 137; 153; 156; 163; 165; 173; 176; 182; 196.

clothes.”⁶⁵ The following month, another person reported, “they give us used, stained and torn clothes.”⁶⁶ Another person reported in March 2024, “it’s very bad - - they finally brought sheets, [but] it had been 3 months. And still no blankets... [The] sheets are worn and dirty.”⁶⁷ Another person reported that their blankets hadn’t been changed in 5 months.⁶⁸ Reports indicate that a recent fire in the NWIPC laundry facility exacerbated these issues.⁶⁹ Many people have reported that they go days or weeks without access to clean clothing and undergarments.⁷⁰ Others have resorted to “handwashing their clothes when they shower.”⁷¹

Conditions are no better when it comes to basic hygiene supplies. Instead of being provided with items such as soap and toilet paper, people detained at NWIPC are forced to purchase these items at commissary—or simply go without. “There’s no more toilet paper or soap for handwashing. They need to buy soap at \$6. You don’t get [soap] for free unless you’re in [solitary confinement] where you can shower every three days.”⁷²

⁶⁵ Id. at row 8.

⁶⁶ Id. at row 61.

⁶⁷ Id. at row 196.

⁶⁸ Id. at row 110.

⁶⁹ Id. at rows 131; 135; 137; 182.

⁷⁰ Id. at row 78; 156; 163; 176.

⁷¹ Id. at rows 153; 182.

⁷² Id. at row 202.

Even worse, GEO's responses to hunger strikers within the facility demonstrate that GEO deliberately withholds adequate sanitation and food. People detained in NWIPC previously went on hunger strike for multiple days to protest poor conditions within their unit.⁷³ In response, "GEO delivered clean clothes, sent a crew to clean the unit, and food portions were bigger ... [however] these changes were only put in place in their unit and did not continue."⁷⁴ Simply put, GEO recognizes that it is well within its power to provide people in custody with more food, clean clothing, and clean living conditions, but it chooses not to do so.

c. *NWIPC both delays and denies provision of medical and mental health care.*

The UWCHR reviewed approximately 3,500 pages of internal grievances filed by people detained in the facility from 2012 to 2018 and found that medical neglect was the second most common area of concern, including recurrent problems with denial or delay of treatment and mismanagement of chronic conditions, especially mental health.⁷⁵ The situation has not improved. In 2023, DHS OIG reported that at NWIPC, "more than 30 percent of the facility's medical staff positions were vacant, preventive screening practices were not consistently

⁷³ App. 3, Ex. B at 34.

⁷⁴ Id.

⁷⁵ Conditions at the NWDC: Allegations of Medical Neglect, Univ. of Wash. Ctr. for Hum. Rts. (Apr. 16, 2020), <https://jsis.washington.edu/humanrights/2020/04/16/nwdc-medical/>.

applied, and the facility was not immediately able to locate the emergency delivery kit.”⁷⁶ Reports to La Resistencia also detail how NWIPC staff use solitary confinement against people who speak out about conditions or report mental health symptoms.

i. Denial or delay of treatment

People detained frequently report delayed or denied care to La Resistencia. In January 2024, an individual in NWIPC reported that he had been in GEO’s facility for more than five weeks without his high blood pressure medication and that “he asked to see the doctor, but he has not been seen … he is already losing vision in his left eye because he is not taking the medication.”⁷⁷ In March 2024, another individual reported that “his skin is yellow, his eyes are yellow, he has been to the doctor three times and they don’t give him anything … he feels weak and with a fever.”⁷⁸ One of the most egregious instances of delayed care involved a dialysis patient who asked for medical attention in October 2023 because he had “stomach pain and blood in his urine and his eyes were yellow and they didn’t believe him.”⁷⁹ Five months later, in March 2024, the individual received a blood test and was later hospitalized and diagnosed with cancer.⁸⁰

⁷⁶ Results of an Unannounced Inspection, *supra* note 50.

⁷⁷ App. 2, Ex. A at row 29.

⁷⁸ Id. at row 152.

⁷⁹ Id. at row 195.

⁸⁰ Id.

Numerous reports detail how individuals in pain ask to be evaluated for particular medical concerns and are only given pain reducers and turned away without an evaluation.⁸¹ Consequently, even Tylenol is mismanaged. “She was given Tylenol when her record says she is allergic to Tylenol and she had an allergic reaction.”⁸² One individual injured his foot and, after four months of complaining of pain and receiving only pain pills, he was finally taken to the hospital where hospital staff discovered he had an infection in his foot and needed antibiotics.⁸³

Inadequate sanitation at NWIPC contributes to health problems and compounds issues of delayed care. In November 2023, a person reported of his living conditions, “insects are present, [and] everyone in the unit is itchy.”⁸⁴ He continued, “my lesions were taped, but I did not receive other medical care.”⁸⁵ In April 2024, another individual reported to La Resistencia that his blood tested positive for aspergillus fungi, a type of mold, and that there is a “mold infestation within the facility. The prevalence of water leaks, particularly in the kitchen, only

⁸¹ Id. at row 66 (“The dentists are just giving them pills, they’re not treating them.”); See also rows 77; 108; 220; 248; 271; 295 (“[H]e has a broken ankle and torn ankle ligaments, they give him pain pills but do not take him to the hospital and he was told that he had an appointment for further treatment but they have not followed up with him”).

⁸² Id. at row 55. See also row 56.

⁸³ Id. at row 248.

⁸⁴ App. 3, Ex. B at 50-51.

⁸⁵ Id. at 50.

exacerbates this issue.”⁸⁶ This same individual reported that he had been waiting several months and received no treatment, stating, “I begged them not to get me killed here.”⁸⁷

ii. NWIPC mismanages chronic conditions, especially mental health.

The unreliable delivery of medical services leaves people without treatment for chronic conditions. One individual with a history of seizures reported, “I haven’t received any updates on a head scan I had done three months ago, despite following up with medical staff.”⁸⁸ Individuals also reported difficulty accessing mental health treatment services (“[t]hey take too long to give therapy”⁸⁹) as well as feelings of discomfort and lack of trust in mental health treatment (“[w]hen they go to the psychologist, they recount their conversations, everyone knows. They don’t follow the confidentiality or privacy disclosure policies”⁹⁰).

The lack of medical and mental health care leads many people detained in NWIPC to report profound despair. One person said, “I can’t handle this place anymore...it’s like hell over here. Everyone is crying all the time, medical needs are being ignored, and lots of people have already lost hope. We are not humans;

⁸⁶ Id. at 44.

⁸⁷ App. 2, Ex. A at row 246.

⁸⁸ App. 3, Ex. B at 46.

⁸⁹ App 2, Ex. A at row 113.

⁹⁰ Id. at row 204.

we are just numbers.”⁹¹ Another individual reported, “the lack of timely medical treatment exacerbates the emotional toll on detainees, leading some to attempt suicide.”⁹²

d. GEO improperly uses solitary confinement as a mental health management tool and as punishment for people who speak out against abusive conditions.

NWIPC has come under scrutiny for abusive solitary confinement practices. Reports by UWCHR show that NWIPC holds people longer in solitary confinement, on average, than any other dedicated detention facility in the nation.⁹³ The national average over a two-year span was 30 days; at NWIPC over the same period, the average time spent in segregation was 70 days.⁹⁴ However, this number is likely underreported – the UWCHR report revealed that “as many as 86% of NWIPC solitary placements during a one-year period were neither logged in ICE’s monitoring system nor reported to the public.”⁹⁵

Reports to La Resistencia demonstrate that GEO uses solitary confinement to punish and retaliate. In one incident, a Muslim individual refused to take

⁹¹ App. 3, Ex. B at 49.

⁹² Id. at 45.

⁹³ Conditions at the NWDC: Solitary Confinement, Univ. of Wash. Ctr. for Hum. Rts. (Nov. 30, 2020), <https://jsis.washington.edu/humanrights/2020/11/30/nwdc-solitary/>.

⁹⁴ Id.

⁹⁵ Id. By comparing internal and external data, UWCHR observed significant gaps in disclosure wherein GEO and/or ICE systematically underreport the use of solitary confinement in their facilities.

medication because he was prohibited from eating or drinking anything between sunrise and sunset during Ramadan.⁹⁶ GEO officers attempted to force-feed him his medication; when he refused, they took him to solitary confinement.⁹⁷ Another person reported that “anyone who does not eat or have breakfast is considered rebellious and they put them in the hole,” including people who missed meals for reasons like oversleeping through breakfast.⁹⁸ A woman complained to staff that another woman was being sexually harassed by guards; GEO guards threatened her with “the hole” for complaining.⁹⁹ Still another person complained about food so bad it made her sick, and was given four hours in solitary confinement as punishment for complaining.¹⁰⁰

GEO also uses solitary confinement to manage people with mental illness.¹⁰¹ Charles Leo Daniel, a person who suffered from serious mental illness, was held in solitary confinement for almost the entirety of his four years in detention at

⁹⁶ App. 2, Ex. A at row 127.

⁹⁷ *Id.*

⁹⁸ *Id.* at row 168.

⁹⁹ *Supra* at note 34.

¹⁰⁰ App. 2, Ex. A at row 47.

¹⁰¹ Charles Leo Daniel’s Death at NWDC, *supra* note 5.

NWIPC.¹⁰² He died in solitary confinement on March 7, 2024.¹⁰³ Records show that his case was flagged with “significant mental illness.”¹⁰⁴

Both UWCHR reports and reports from people detained to La Resistencia indicate that GEO’s use of solitary confinement for people with mental illness is widespread.¹⁰⁵ One person reported, “if you have suicidal thoughts[,] instead of helping you, they will arrest you and take you to a room and leave you there with no clothes on and an officer is with you 24 hours a day.”¹⁰⁶ Another reported, “he’s been in the hole alone since he arrived because he made a comment. … They asked him if he had thoughts of suicide and he told them that sometimes life is hard and at times he did. They immediately sent him to solitary and put him in a vest and he never went out again until now.”¹⁰⁷

Mr. Daniel’s in-custody death exacerbated the mental health symptoms experienced by people in detention. In La Resistencia’s joint letter to the IACtHR urging protection for people at risk within NWIPC, the authors shared accounts from individuals who had heard about Mr. Daniel’s death and who “[a]ll expressed

¹⁰² Id. Mr. Daniel was placed in solitary confinement two weeks after he entered NWIPC and spent two extraordinarily long stints in solitary confinement, interrupted only by two days among NWIPC’s general population.

¹⁰³ Id. UWCHR requested detailed records of the 911 calls related to Mr. Daniel’s death but those records have yet to be released.

¹⁰⁴ Id.

¹⁰⁵ Id.

¹⁰⁶ App. 2, Ex. A at row 90.

¹⁰⁷ Id. at row 223.

fear of dying or concerning thoughts that they might die alone ... and concerning thoughts on what they would like to do if they die.”¹⁰⁸ Based on these accounts, the authors concluded that people in NWIPC “are facing dire conditions, and many manifested that the only escape is dying.”¹⁰⁹

VI. CONCLUSION

Effective oversight of for-profit facilities like NWIPC is desperately needed to ensure that such facilities meet minimum health and safety standards. Without oversight, GEO endangers people in its custody; denies people basic nutrition and hygiene; neglects medical and mental health concerns, resulting in serious injury or death; and uses solitary confinement to retaliate against people who speak out against deplorable conditions. GEO’s interest in avoiding financial costs cannot outweigh the State’s interest in ensuring the safety and welfare of people in detention. For these reasons, the balance of equities and the public interest weigh heavily against upholding the injunction against HB 1470.

Respectfully submitted this 6th day of June, 2024.

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¹⁰⁸ App. 3, Ex. C at 54.

¹⁰⁹ App. 3, Ex. B at 32.

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

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9th Cir. Case Number(s) 24-2815

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- complies with the length limit designated by court order dated [redacted].
- is accompanied by a motion to file a longer brief pursuant to Cir. R. 32-2(a).

Signature

s/Hannah Woerner

(use "s/[typed name]" to sign electronically-filed documents)

Date

June 6, 2024

CERTIFICATE OF SERVICE

U.S. Court of Appeals Docket Number: 24-2815

I hereby certify that on June 6, 2024, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate system.

I certify that all participants in this case are registered users and that service will be accomplished by the appellate system.

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No. 24-2815

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

THE GEO GROUP, INC.,

Plaintiff-Appellee,

v.

JAY R. INSLEE, in his official capacity as Governor of the State of Washington;
and ROBERT W. FERGUSON, in his official capacity as Attorney General of the
State of Washington,

Defendants-Appellants

On Appeal from the United States District Court for the
Western District of Washington
Civil Case No. 3:23-cv-05626-BHS
(Honorable Benjamin H. Settle)

**APPENDIX TO BRIEF OF LA RESISTENCIA AND
PROF. ANGELINA SNODGRASS GODOY AS AMICI CURIAE IN
SUPPORT OF APPELLANTS**

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APPENDIX 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

UGOCHUKWO GOODLUCK NWAUZOR,
et al.,)
Plaintiffs,)
v.)
THE GEO GROUP, INC.,) 3:17-cv-05769-RJB
Defendant.) 3:17-cv-05806-RJB
STATE OF WASHINGTON,)
Plaintiff,) Tacoma, Washington
v.)
THE GEO GROUP, INC.,)
Defendant.)

October 18, 2021
Jury Trial
9:00 a.m.

VERBATIM REPORT OF PROCEEDINGS
BEFORE THE HONORABLE ROBERT J. BRYAN
UNITED STATES DISTRICT JUDGE

Proceedings stenographically reported and transcribed
With computer-aided technology

1 Okay. Let's take a break.

2 (Recessed.)

3 THE COURT: Are you in charge of the jury again?

4 Bring them in.

5 (The following occurred in the presence of the jury.)

6 THE COURT: Counsel, you may continue.

7 MR. POLOZOLA: Thank you, Your Honor.

8 BY MR. POLOZOLA:

9 Q Mr. Kimble, as a business manager, you are familiar with
10 the Northwest Detention Center's actual operating margins on
11 a yearly basis, correct?

12 A Yes.

13 Q What is your understanding of the term "operating margin"?

14 MS. ARANGO: Objection, relevance.

15 THE COURT: Overruled.

16 THE WITNESS: Our operating margin would be basically
17 what we have coming in based on the contract from the client
18 and then taking out what our expenses were locally here at
19 the facility.

20 BY MR. POLOZOLA:

21 Q So it is your revenue minus your expenses, correct?

22 A Yes, that's the word. Yes, revenue minus expenses.

23 Q It's your profit, correct?

24 A It's my operating margin for the facility.

25 Q Does your operating margin include GEO's revenue minus its

1 labor expenses?

2 A Say that one more time, please.

3 Q Does operating margin include revenue minus GEO's labor
4 expenses at the Northwest Detention Center?

5 A It's minus all expenses that I have listed for the
6 facility, and revenue is part of that, yes.

7 Q So GEO has to pay staff overtime because there aren't
8 enough detainee workers to do the work necessary in the
9 facility; that cuts into GEO's operating margin, correct?

10 A That would take a portion of it out, yes.

11 Q Just like any company anywhere, that would cut into your
12 profit, right?

13 A Yeah, if it is above what we've budgeted for.

14 Q And in your experience, what has GEO's annual operating
15 margin been for the Northwest Detention Center?

16 MS. ARANGO: Objection, relevance.

17 THE COURT: Overruled.

18 THE WITNESS: Somewhere around 30 percent.

19 BY MR. POLOZOLA:

20 Q Can you give me an actual number?

21 A Like on a -- it's ranged from -- anywhere from 18 million
22 to 20 million at the end of the year.

23 Q Thank you.

24 MR. POLOZOLA: No further questions, Mr. Kimble.

25 Counsel may have some additional questions for you.

CERTIFICATE

I certify that the foregoing is a correct transcript from
the record of proceedings in the above-entitled matter.

/s/ Angela Nicolavo

ANGELA NICOLAVO
COURT REPORTER

APPENDIX 2

No. 24-2815

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

THE GEO GROUP, INC.,

Plaintiff-Appellee,

v.

JAY R. INSLEE, in his official capacity as Governor of the State of Washington; and ROBERT W. FERGUSON, in his official capacity as Attorney General of the State of Washington,

Defendants-Appellants

On Appeal from the United States District Court
for the Western District of Washington
Case No. 3:23-cv-05626-BHS

**DECLARATION OF LILIANA CHUMPITASI IN SUPPORT OF
BRIEF OF AMICI CURIAE LA RESISTENCIA AND PROF. ANGELINA
SNODGRASS GODOY**

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Hannah.Woerner@columbialegal.org

I, Liliana Chumpitasi, declare under penalty of perjury of the laws of the state of Washington:

1. I am over the age of 18 and at all times competent to testify as to the contents of this declaration. I am making this declaration based on my personal knowledge of the subject matter herein.

2. I am a member of La Resistencia, a grassroots, volunteer-based organization based in Washington State working to end detention and deportations in the state. La Resistencia maintains daily communication with people detained in the Northwest Detention Center (NWDC) through a phone hotline, emails, visits, and public demonstrations.

3. I sit on La Resistencia's steering committee. In addition, I act as La Resistencia's liaison to the Washington Department of Health (DOH) team tasked with implementing House Bill (HB) 1470.

4. HB 1470 (codified as Chapter 70.395 RCW) grants DOH access to private detention facilities to conduct health and safety inspections, perform water and air quality tests, and investigate complaints alleging noncompliance with Chapter 70.395 RCW.

4. La Resistencia receives complaints related to health and safety from people detained at NWDC through phone, email, and visits. Members and volunteers who receive complaints from people in detention input those complaints

into a central spreadsheet. La Resistencia regularly transmits this complaint log to the DOH team responsible for implementing House Bill 1470.

5. I am in charge of maintaining the spreadsheet cataloguing complaints received from people detained at NWDC.

6. A true and correct—and redacted—copy of the complaint log documenting all complaints received by La Resistencia from January 1, 2024 until May 8, 2024 is attached to this declaration as Exhibit A. Names of individuals who submitted complaints or who were referenced in a complaint have been redacted to protect those individuals' privacy.

Signed this 31 day of May, 2024 at Tacoma, Washington.

A handwritten signature in black ink, appearing to read "L. Chumpitasi".

Liliana Chumpitasi

EXHIBIT A

A NAME / NOMBRE	B LAST NAME APELLIDO	C A NUMBER NUMERO DE A UNIT	D UNIDAD	E TOTALS	F PAÍS	G IDIOMA	H DATE FECHA	I INCIDENT DATE	J TIME	K CATEGORY	L GRIEVANCE / QUEJA
1	REDACTED	REDACTED	REDACTED	63	SP	01/04/2024					
2	REDACTED	REDACTED	REDACTED								fue a medico y pidió que lo revisara un oculista y le dijeron que costaba muy caro. solo le dicen que le haran cita con el perro nunca te dice cuando No tienen bañas ni jabón ni ropa. Tebemos que llamar. seguido y se cortan las llamadas
3	REDACTED	REDACTED	REDACTED								
4	REDACTED	REDACTED	REDACTED	A1	85	MONGOLIA	ENG	01/04/2024			It is my greatest surprise how many people I saw in one unit. A1 has 85 detainees in one unit being homeless with the facility. I spoke to almost all of them about their concerns. Can you believe that they costaba a muy microve for 6 straight days. They cleaners only comes once in three or four days. They are all complaining about their cases. I have already told them to come and fix this place and they havent done anything yet. The two microwave here has been faulty for 6 days and the geo officer asked me if I crossed illegally or legally. They cleaned last night who clean this place is them, almost 40 something people are using one restroom one toilet. 40 something people is using 1 toilet in this unit. 47, we are the ones who are cleaning we are who are cleaning everything we are who cleaned the restroom they said we have to go clean it ourselves. So I have to clean it yesterday I have to clean today again this morning have hours. I told them to call the cleaners to come and clean yesterday and they said they have no cleaners. I thought G4 I thought the G Units was dirty, this place is worse. They treat people worse then they treat people worse because this people don't have nowhere to speak up. con una compañera hubo acceso en el baño a una compañera le abrieron la cortina del baño, me dijo que la muchacha estaba muy bonita, hizo reporte y la retiraron pero tengo miedo.
5	REDACTED	REDACTED	REDACTED								
6	REDACTED	REDACTED	REDACTED	A1	85	MONGOLIA	ENG	01/05/2024			I have to come here and demand for them (people from India) to fix it right away, that's why they fixed it because this people dont ave anybody to speak for them and everyone was giving me complains they were giving me a lot of complains when i came here. They were telling me how they were treating them, their TV was being off, they wouldn't talked to them like individuals. They cleaned last night who clean this place is them, almost 40 something people is using one restroom one toilet. 40 something people is using 1 toilet in this unit 47. I have to i have to do just what i can i have to go clean the toilet then put paper on it then tell everybody clean after you, you know because you know they never been in america so they dont understand about. we are who are cleaning everything we are who cleaned the restroom they said we have to go clean it ourselves. I told them (GEO) to call the cleaners to come and clean yesterday and they said they have no cleaners. I thought G4 I thought the G Units was dirty, this place is worse. They treat people worse then they treat people worse because this people don't have nowhere to speak up. 6 baños para 70 personas en su unidad, no esta limpando la unidad, la comida no ha cambiado nada, trato inhumano, los tratan diferente en esa unidad (el estuio en G4 y lo pasaron a D2 y los tratan peor)
7	REDACTED	REDACTED	REDACTED	D2	70	NIGERIA	ENG	01/05/2024			
8	REDACTED	REDACTED	REDACTED	C2							el lutenant REDACTED ayer 1/7/24 pedia identificación para daries el almuerzo. REDACTED se nego y Johnson llamo a su equipo IMLS, varios de Geo fueron y se llevaron a REDACTED a intake. Ahlo tuvieron como 40 mins, y al final REDACTED se redacto pines es verdad lo que le decia chidi que no hay requisito de dar ID para poder comer. We didn't have table access for the last 3 days. We are back on line today. and someone passed away in females unit. I am not sure though. Están poniéndose de acuerdo para que empiezar una huelga de hambre al inicio de mes sus demandas mejorar comida, servicio médico decente medicamentos y ropa limpia.
9	REDACTED	REDACTED	REDACTED	A1	85	MONGOLIA	ENG	01/08/2024			
10	REDACTED	REDACTED	REDACTED	B3	Nepal	ENG		01/10/2024			
11	REDACTED	REDACTED	REDACTED	G4	50		SP	01/10/2024			

	A	B	C	D	E	F	G	H	I	J	K	L
12 REDACTED	REDACTED	REDACTED	B1	REDACTED	ENG	01/11/2024						
13 REDACTED	REDACTED	REDACTED	REDACTED	G4	38	SP	01/12/2024					
14 REDACTED	REDACTED	REDACTED	REDACTED	G3	Mexico	SP	01/12/2024					
15 REDACTED	REDACTED	REDACTED	REDACTED	F3	El Salvador	SP/ENG	01/12/2024					
16 REDACTED	REDACTED	REDACTED	REDACTED	F4	45	SP	01/12/2024					
17 REDACTED	REDACTED	REDACTED	REDACTED	F4	45	SP	01/12/2024					
18 REDACTED	REDACTED	REDACTED	REDACTED	F4	SP/ENG							
19 REDACTED	REDACTED	REDACTED	REDACTED	G4	38	SP	01/12/2024					
20 REDACTED	REDACTED	REDACTED	REDACTED	G4	SP	01/13/2024						
21 REDACTED	REDACTED	REDACTED	REDACTED	B1	ENG	01/15/2024						
22 REDACTED	REDACTED	REDACTED	REDACTED	G3	40	SP	01/15/2024					
23 REDACTED	REDACTED	REDACTED	REDACTED	G3	45	Mexico	SP	01/16/2024				
24 REDACTED	REDACTED	REDACTED	REDACTED	B3	SP	01/19/2024						
25 REDACTED	REDACTED	REDACTED	REDACTED	F4	Mexico	SP	01/19/2024					
26 REDACTED	REDACTED	REDACTED	REDACTED	F4	SP	01/19/2024						
27 REDACTED	REDACTED	REDACTED	REDACTED	F3	01/22/2024							
28 REDACTED	REDACTED	REDACTED	REDACTED	G3	45	Mexico	SP	01/23/2024				
29 REDACTED	REDACTED	REDACTED	REDACTED	G4	Brazil	SP	01/27/2024					
30 REDACTED	REDACTED	REDACTED	REDACTED	C1	01/27/2024							

A	B	C	D	E	F	G	H	I	J	K	L
31 REDACTED	REDACTED	REDACTED	REDACTED	C1	Honduras	SP	01/27/2024	1 mes 1/2 en detención reportan que se enferma cada vez que comen es la primera vez y llama y también dice q esta en depresión por tanto encierro solo está limpando 1 vez por dia.			
32 REDACTED	REDACTED	REDACTED	REDACTED	G3	Mexico	SP	01/31/2024	Está detendo desde 3 meses y q ha mandado una petición para ir al hospital inflamadas y no le han contestado			
33 REDACTED	REDACTED	REDACTED	REDACTED	C4	Mexico	SP	02/01/2024	ya q posiblemente tiene cancer de prostata y tiene las varices muy			
34 REDACTED	REDACTED	REDACTED	REDACTED	G3	Mexico	SP	02/01/2024	no tenemos agua desé de mañana segun la tubería se averio			
35 REDACTED	REDACTED	REDACTED	REDACTED	A1			02/01/2024	la comida esta de mal gusto la sirven helada			
36 REDACTED	REDACTED	REDACTED	REDACTED	F4			02/01/2024	arrejone el boiler de agua caliente pero todavía el agua está helada y el aire caliente no está funcionando			
37 REDACTED	REDACTED	REDACTED	REDACTED				02/02/2024	Les avisaron antes de que quitaran el agua porque la iban a comprar para que pudieran tener agua caliente, la orden la puso el oficial stock y que el agua solamente se fue por dos horas pero continua fria			
38 REDACTED	REDACTED	REDACTED	REDACTED				02/02/2024	Entró con una rodilla mal hizo cita al medico, le dijeron que iba a ir a terapia y que posiblemente necesitaba cirugia, le nunció la aprobó la aplicación y será deportada			
39 REDACTED	REDACTED	REDACTED	REDACTED	C1			02/02/2024	The WiFi is having an issue today, I picked up and the line cuts off and the CO said the WiFi has issue.			
40 REDACTED	REDACTED	REDACTED	REDACTED	B1			02/02/2024	Sus niveles de glucosa estan elevados, es prediabetico o punto de tener diabetes, su orina esta mal le dijeron que puede tener problemas de riñones en el futuro			
41 REDACTED	REDACTED	REDACTED	REDACTED	A1	150	MONGOLIA	ENG	02/05/2024	Las condiciones de comida son muy malas especialmente para él porque es alérgico a la cebolla y al cacahuate y solo se come las frutas como manzanas y ensaladas que le dan no está recibiendo ningún otro tipo de comida, ya dijó que su alergia pero le dijeron que tenía que ir a médico primero pero no le han dado ninguna cita esa está teniendo dificultades para comunicarse o medir su talla porque no sabe leer ni escribir y los guardias se portan muy groseros con él y no quieren ayudarle. Ahora les está pidiendo ayuda a unos compañeros de la unidad para llenar sus papeleras y pedir cita también ya hasta tiene diarrea por eso que no está recibiendo nada de alimento sólido		
42 REDACTED	REDACTED	REDACTED	REDACTED	G3	60	Mexico	SP	02/05/2024	hace dos días un compañero en la unidad sufrió un desmayo su nombre de es REDACTED lo llevaron a enfermería pero no le dieron razón del por qué se desmayó. La comida empeoró. Ahora les dan muy poca, antes la comida estaba llegando a las 5pm ahora llega a las 8 de la tarde La limpieza van dos veces al dia pero solo limpian superficialmente		
43 REDACTED	REDACTED	REDACTED	REDACTED	F4			02/05/2024	Tres días sin tabla, no tienen internet, no pueden recibir llamadas. Hace unos días la cena estaba llegando a las 6 ahora está llegando a las 8 de la noche. Están teniendo muchos problemas con las toallas de papel, eso ha pasado desde siempre, solo duran tres días y se terminan y no les dan hasta después de mucho tiempo. Otra vez los toilets están tapados los dejan así por unas hasta por una semana.			
44 REDACTED	REDACTED	REDACTED	REDACTED	G2			02/05/2024	Está infectado con hongos en los pies y que se está transmitiendo entre los detenidos y q han ido a ver el doctor y solo le dan una crema, pero sus síntomas están peor y regreso al doctor y q le dijeron q no tienen algo más fuerte para darle			
45 REDACTED	REDACTED	REDACTED	REDACTED	F4			02/05/2024	No se si han reportado que hemos estado 3 días, ya 4 mañana sin internet?			
46 REDACTED	REDACTED	REDACTED	REDACTED	B3			02/06/2024	Ahorita te estoy mandando mensajito porque no les dan información de sus conexión. Les he estado diciendo a los tenientes, incluido un oficial de ice y no han hecho Nada a respecto. Desde el sábado no tenemos internet e incluso algunos no pudieron ordenar comidas por lo mismo. Ayer a las 9pm nos dieron bubble sheets para ordenar pero como Nos ejerieron tarde muchos no alcanzaron			
47 REDACTED	REDACTED	REDACTED	REDACTED	B3			02/06/2024	Están haciendo huele de hambre porque no les dan información de sus casos, los tratan como animales, la comida esta muy mala, el ambiente no esta limpia, empleados de Geo muy groseros, gente se esta contagiendo con covid			
48 REDACTED	REDACTED	REDACTED	REDACTED	C2			02/07/2024	8112 y en la cena y la del almuerzo a las 2pm o 2:30 y el menu siempre es arroz con frijoles, sandwich de mofatada pollo todavía con sangre. También les están dando ropa usada que otras presas dejan con olores perjudiciales y con mal olor y q hicieron un reclamo a REDACTED Que es la persona q se encarga de las quejas y les dijeron q no tienen presupuesto nuevo. También pidieron cobijas nuevas y no les proveieron porque no tienen, las noches están muy frio. También que las cortinas del baño están con moho.			
49 REDACTED	REDACTED	REDACTED	REDACTED	ENG			02/08/2024	I was tested positive for Covid and broke my ankle in 4 months. They didn't take care of my ankle. Still visible.			
50 REDACTED	REDACTED	REDACTED	REDACTED	MEXICO			02/08/2024	La comida está llegando tarde hoy ya es la 1pm cuando debió de haber llegado a las 11am. dice que los techos están húmedos y ellos están en la parte baja entonces piensan que probablemente es humedad de los baños o regaderas del segundo piso los pisos se la pasan mojados			

A	B	C	D	E	F	G	H	I	J	K
51 REDACTED	REDACTED	REDACTED	REDACTED	38	Peru	SP	02/08/2024			
52 REDACTED	REDACTED	REDACTED	REDACTED	63		SP	02/09/2024			
53 REDACTED	REDACTED	REDACTED	REDACTED			ENG	02/09/2024			
54 REDACTED	REDACTED	REDACTED	REDACTED	F4			02/12/2024			
55 REDACTED	REDACTED	REDACTED	REDACTED	C2		SP	02/12/2024			
56 REDACTED	REDACTED	REDACTED	REDACTED	C2			02/13/2024			
57 REDACTED	REDACTED	REDACTED	REDACTED	F3			02/14/2024			
58 REDACTED	REDACTED	REDACTED	REDACTED	F3	Mexico	SP	02/15/2024			
59 REDACTED	REDACTED	REDACTED	REDACTED	B3	Nepal	ENG	02/15/2024			
60 REDACTED	REDACTED	REDACTED	REDACTED	C2		SP	02/17/2024			
61 REDACTED	REDACTED	REDACTED	REDACTED	C2		SP	02/17/2024			
62 REDACTED	REDACTED	REDACTED	REDACTED	F3		ENG	02/18/2024			
63 REDACTED	REDACTED	REDACTED	REDACTED	F3		ENG	02/18/2024			
64 REDACTED	REDACTED	REDACTED	REDACTED	F4	Mexico	SP	02/18/2024	02/18/2024		
65 REDACTED	REDACTED	REDACTED	REDACTED	F4	Mexico	SP	02/18/2024			
66 REDACTED	REDACTED	REDACTED	REDACTED	G4		SP	02/20/2024			
67 REDACTED	REDACTED	REDACTED	REDACTED	Brazil		SP	02/20/2024			
68 REDACTED	REDACTED	REDACTED	REDACTED	F4	El Salvador	SP / ENG	02/23/2024			
69 REDACTED	REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	02/23/2024			
70 REDACTED	REDACTED	REDACTED	REDACTED	C2		SP	02/24/2024	02/21/2024		
71 REDACTED	REDACTED	REDACTED	REDACTED			ENG	02/27/2024			

	A	B	C	D	E	F	G	H	I	J	K	L
72	REDACTED											
73	REDACTED											
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88	REDACTED											
89	REDACTED											
90	REDACTED											

	A	B	C	D	E	F	G	H	I	J	K	L	
91	REDACTED	REDACTED	REDACTED	REDACTED	A3	MONGOLIA	ENG	03/08/2024	Abuse/Discrim inatives words Communicatio	Por ESO es q todo estaba apagado y no nos dejaron comunicarnos asta las 3 de la tarde			
92	REDACTED	REDACTED	REDACTED	REDACTED	F4		SP/ENG	03/08/2024	Abuse/Discrim inatives words Communicatio	Por ESO es q todo estaba apagado y no nos dejaron comunicarnos asta las 3 de la tarde			
93	REDACTED	REDACTED	REDACTED	REDACTED	B3	Nepal	ENG	03/09/2024	Abuse/Discrim inatives words	B-3 is on hunger strike. About 60 detainees. Started last night. They said they gonna keep going until they started releasing people who been here for awhile. Health care is very slow, response time us slow sanitation is bad. Supervisors are not responding on time. Maintenance is not fixing things. Clogged sinks and shower drains are not fixed for weeks sometimes. Hardly get cleaning twice a day. Sometimes not even a single time in day. So much more.			
94	REDACTED	REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/10/2024	Abuse/Discrim inatives words	Abuse/Discrim Vegetarian and non vegetarian food are so bad people depend on commissary for 3 meals. I will talk to you sometime today.			
95	REDACTED	REDACTED	REDACTED	REDACTED	D2		SP	03/11/2024	Abuse/Discrim inatives words	I just heard someone in B3 tried committing suicide. I saw them bring him back from the hospital this morning. I didn't get his name, then 4 more people joined the hunger strike in this our unit.			
96	REDACTED	REDACTED	REDACTED	REDACTED	D2		SP	03/11/2024	Food/Comida Communicatio	Dijo que la comida sigue muy mala muy fria. Solamente les estan dando puras papas			
97	REDACTED	REDACTED	REDACTED	REDACTED	F4	46	Mexico	SP	03/11/2024	Food/Comida Communicatio	el dia de ayer la tablet no funcionaba		
98	REDACTED	REDACTED	REDACTED	REDACTED	B3	Nepal	ENG	03/11/2024	Food/Comida Communicatio	reports que hay 46 personas en la unidad y se estan enfermando con gripe			
99	REDACTED	REDACTED	REDACTED	REDACTED	G3		SP	03/11/2024	Food/Comida Communicatio	We think we are blocked. That's what Indians are telling me.			
100	REDACTED	REDACTED	REDACTED	REDACTED				03/11/2024	Food/Comida Communicatio	El agua esta saliendo muy fria, casi todo el dia, no sabe si hay problema con la tuberia, ya se quejaron y no hay ido			
101	REDACTED	REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/11/2024	Abuse/Discrim inatives words	Encuentro piedra en la comida, tenemos foto			
102	REDACTED	REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	03/11/2024	Abuse/Discrim inatives words	Lvngset hung himself now in my pod just now.			
103	REDACTED	REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	03/11/2024	Abuse/Discrim inatives words	An Indian detainee in B3 tried to commit suicide two days ago, but thank GOD he was stopped and rushed to hospital same day. He was discharged from hospital in wheelchair and I don't know if he is still here.			
104	REDACTED	REDACTED	REDACTED	REDACTED	Venezuela	SP	03/11/2024	Abuse/Discrim inatives words	B1, B2, B3 and A3 is officially on hunger strike as I write to you. A3 started this morning. Am not aware when the B's started. A2 will start 2mro. We are 90 detainees here and only 11 is not on hunger strike, but the rest is on hunger strike. Too many detainees have now have the tendency of committing suicide because their mental health is getting worst every seconds. This facility is full and their is no new space anymore look in. It is so noisy we can't even hear someone through the phone anymore. We can't sleep and no one can even read or write. This place is really a slaughter house.				
105	REDACTED	REDACTED	REDACTED	REDACTED			SP	03/11/2024	Abuse/Discrim inatives words	Oficiales de Geo se lo llevaron al horno para amedrantado por ser testigo de la persona que intento suicidarse, lo golpearon y le dieron la boca para que no			
106	REDACTED	REDACTED	REDACTED	REDACTED	B1		ENG	03/11/2024	Abuse/Discrim inatives words	Cuando paso el incidente, de la persona ahorcandose, en vez de llegar los medicos, llegaron los guardias de GEO , mas de 10 a empujar, hacer represion y gritar, amenazar y golpear. No quiere que hablen. Que si hablan si pondria mas grave, que si hablan "venia la muerte" . Hay gente muy afectada por lo que paso psicologamente. (REDACTED) fue deportado o trasladado a otra detencion despues de esto como a varios otros.			
107	REDACTED	REDACTED	REDACTED	REDACTED	B1		ENG	03/11/2024	Abuse/Discrim inatives words	Abuse/Discrim despues de presentar el intento de suicidio muchos decidieron hacer huelga de hambre. Ellos solo pidien asilo			
									Medical/Médic	Medical/Médic Su padre tuvo ataque cardiaco y fue al hospital 2 veces y sigue ahi (con él), la medicina le hace mal			

	A	B	C	D	E	F	G	H	I	J	K	L
108	REDACTED	REDACTED	REDACTED	B3	Nepal	Punjabi	03/11/2024					
109	REDACTED	REDACTED	REDACTED	B3	Nepal	Punjabi	03/11/2024					
110	REDACTED	REDACTED	REDACTED	B3	Nepal	Punjabi	03/11/2024					
111	REDACTED	REDACTED	REDACTED	B3	Nepal	Punjabi	03/11/2024					
112	REDACTED	REDACTED	REDACTED	F1	INDIA	ENG	03/12/2024					
113	REDACTED	REDACTED	REDACTED	H		SP / ENG	03/12/2024					
114	REDACTED	REDACTED	REDACTED	H		SP / ENG	03/12/2024					
115	REDACTED	REDACTED	REDACTED	H		SP / ENG	03/12/2024					
116	REDACTED	REDACTED	REDACTED	H		SP / ENG	03/12/2024					
117	REDACTED	REDACTED	REDACTED	H		SP / ENG	03/12/2024					
118	REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/12/2024					
119	REDACTED	REDACTED	REDACTED	H	El Salvador	SP / ENG	03/12/2024					
120	REDACTED	REDACTED	REDACTED	H	El Salvador	SP / ENG	03/12/2024					
121	REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	03/12/2024	03/12/2024	6:00 PM	Abuse/Discrim	inatives words	
122	REDACTED	REDACTED	REDACTED	D2	Pakistan	ENG	03/13/2024			Religion		

	A	B	C	D	E	F	G	H	I	J	K	L
123 REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	03/13/2024						
124 REDACTED	REDACTED	REDACTED	Fiji	ENG	03/13/2024							
125 REDACTED	REDACTED	REDACTED	A1	MONGOLIA	ENG	03/13/2024	03/13/2024 11:30 PM					
126 REDACTED	REDACTED	REDACTED	D2	INDIA	ENG	03/14/2024						
127 REDACTED	REDACTED	REDACTED	D2	Pakistan	ENG	03/14/2024						
128 REDACTED	REDACTED	REDACTED	500	SP	03/15/2024							
129 REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/15/2024						
130 REDACTED	REDACTED	REDACTED	B3	Jamaica	ENG	03/15/2024						
131 REDACTED	REDACTED	REDACTED	B3	Jamaica	ENG	03/15/2024						
132 REDACTED	REDACTED	REDACTED	B3	ENG	03/15/2024							
133 REDACTED	REDACTED	REDACTED	B3	ENG	03/15/2024							
134 REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/16/2024						
135 REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	03/16/2024						
136 REDACTED	REDACTED	REDACTED	ENG/	ENG/	ENG/	03/16/2024						
137 REDACTED	REDACTED	REDACTED	F4	Mexico	SP	03/16/2024						

	A	B	C	D	E	F	G	H	I	J	K	L	
138 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
139 REDACTED	REDACTED	REDACTED	REDACTED A1	MONGOLIA	ENG	03/17/2024	03/17/2024	03/17/2024	03/17/2024	03/17/2024	03/17/2024	Una persona nos informa que en el F4 están obligando a los detenidos a firmar deportación y que el oficial estaba firmando deportaciones por los detenidos (falsificando firmas). Lo dijo una persona liberada. No nombre	
140 REDACTED	REDACTED	REDACTED	REDACTED	El Salvador	SP / ENG	03/17/2024	03/17/2024	03/17/2024	03/17/2024	03/17/2024	03/17/2024	Abuse/Discrim inates words	
141 REDACTED	REDACTED	REDACTED	REDACTED	Ecuador	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
142 REDACTED	REDACTED	REDACTED	REDACTED	Ecuador	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
143 REDACTED	REDACTED	REDACTED	REDACTED F4	55	Mexico	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words
144 REDACTED	REDACTED	REDACTED	REDACTED F4	55	Mexico	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words
145 REDACTED	REDACTED	REDACTED	REDACTED F4	55	Mexico	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words
146 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
147 REDACTED	REDACTED	REDACTED	REDACTED F4	55	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
148 REDACTED	REDACTED	REDACTED	REDACTED F4	55	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
149 REDACTED	REDACTED	REDACTED	REDACTED F4	55	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
150 REDACTED	REDACTED	REDACTED	REDACTED F4	55	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
151 REDACTED	REDACTED	REDACTED	REDACTED F4	55	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	
152 REDACTED	REDACTED	REDACTED	REDACTED G3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
153 REDACTED	REDACTED	REDACTED	REDACTED C2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
154 REDACTED	REDACTED	REDACTED	REDACTED C2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
155 REDACTED	REDACTED	REDACTED	REDACTED REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
156 REDACTED	REDACTED	REDACTED	REDACTED REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
157 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	Abuse/Discrim inates words	
158 REDACTED	REDACTED	REDACTED	REDACTED F4	Mexico	SP	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	03/18/2024	Abuse/Discrim inates words	

	A	B	C	D	E	F	G	H	I	J	K
159 REDACTED	REDACTED	REDACTED	REDACTED	Fiji	ENG	03/19/2024					
160 REDACTED	REDACTED	REDACTED	REDACTED F4	REDACTED	ENG	03/19/2024					
161 REDACTED	REDACTED	REDACTED	A2	REDACTED	ENG	03/19/2024					
162 REDACTED	REDACTED	REDACTED	F4	REDACTED	SP	03/19/2024					
163 REDACTED	REDACTED	REDACTED	C2	REDACTED	SP	03/19/2024					
164 REDACTED	REDACTED	REDACTED	C2	REDACTED	SP	03/19/2024					
165 REDACTED	REDACTED	REDACTED	C2	REDACTED	SP	03/19/2024					
166 REDACTED	REDACTED	REDACTED	G4	REDACTED	SP	03/19/2024					
167 REDACTED	REDACTED	REDACTED	G4	REDACTED	SP	03/19/2024					
168 REDACTED	REDACTED	REDACTED	G4	REDACTED	SP	03/19/2024					
169 REDACTED	REDACTED	REDACTED	F4	Mexico	SP	03/19/2024					
170 REDACTED	REDACTED	REDACTED	G4	Nigeria	ENG	03/19/2024					
171 REDACTED	REDACTED	REDACTED	D2	Pakistan	ENG	03/19/2024					
L											
ICE continue to display any empathy towards "sexual assault" victim's in their custody and control. I have continued to raise concerns regarding the findings issued by the Homeland Security for the Office for Civil Rights and Civil Liberties (CRCI) into my sexual assault allegation which ICE/GEO covered up yet ICE AFOD REDACTED don't seems to care about my ongoing safety inatives words and mental health concerns.											
I would like to inform you that starting today F-4 is on hunger strike for verity of reasons. All 53 men's are participating with this hunger strike till further notice. We are probably going to be a subject of retaliation by ICE and GEO everyday. CERT gang specifically Officer REDACTED me who is a Bad Custody Emergency Response Team targeting detainees with mental health and others who protesting about staff misconduct and other imperialive issues. He co-conspirators are REDACTED, REDACTED and Lt. REDACTED. I will update you more. We are being silenced and oppressed by ICE and GEO. I feel very helpless and hopeless. One more thing, they transferred those who witnessed the detainee die and all his neighbors. Abuse/Discribm inatives words											
vino el de ce y los amenazan que si seguian (en huelga) no le iban fianzas. No los dejan salir a la yarda ni al espacio de recreacion porque alguien se trato de hacer daño. Esto es una prisión. Canácelaron todo aver. Se llevaron a varios de aqui. El es de Washington y le da miedo que lo lleven a otro estado. Solo quedan como 30 de 80 eran. Los que habian con LR se los llevan F4 estan huelga empezando hoy. 46. Estarán por 3 dias. Esto es porque ayer en la fila para la medicina les dijeron que no les darian tiempo de recreacion por las manifestaciones por la muerte del Sr. Daniel. Ellos escogen hacer la huelga porque saben que estamos fuera y nos quieren apoyar por todo lo que hacemos.											
Demandas: Ropa: Atención médica. Información de lo que está pasando Apagar la luz en las noches para poder dormir. Siguien esperando que el Abuse/Discribm senior que se llevaron anterior al hospital (que tiene marcaspasos) Ignacio (algo) inatives words Diaz.											
Abuse/Discribm Clothes/Bedding No tiene ropa desde el Jueves. 6 días sin ropa limpia											
Abuse/Discribm inatives words No las dejan salir afuera porque nosotros estamos aqui											
Infrastructure moverieron la lavanderia a una unidad que no es diseñada para ese propósito están en hunger strike algunas de sus demandas no tienen Ropa limpia no tienen tiempo de recreacion no los dejan salir a la yarda. Derecho a fianza, acceso al medico. Deportación inmediata para las personas que le dieron Deportación y están ahí por más de 5 meses. que se les trate y respeten sus inatives words derechos humanos.											
Abuse/Discribm We are on hunger strike starting today.the whole nonsense here is getting out inatives words of hand.The whole G4 unit are on hunger strike											
me acaba de hablar mi hijo de ahí adentro él está en la zona al me dice que ya ahorita la persona que no come o no desayuna lo toman como rebeldes y los meten al hoyo es un cuarto oscuro sin comunicacion sin baño sin camas y es completamente oscuro entonces cada vez que desayuna le piden su identificación cada vez que van a comer otra vez le piden las identificación él no desayuna el dia de hoy porque se quedo dormido y ahorita en la hora de la comida le leuron a decir que si se iba a poner rebelde a no comer pienso que hay mucha presión con la huelga de hambre pero él les dijo que si que él si queria comer solo que no habia desayunado porque se habia quedado a meter al hoyo como castigo											
Abuse/Discribm hygiene personal, no les han cortado el pelo desde hace mucho tiempo, no hay cambio de ropa Huelga de hambre. La demanda es que para que aijissen los casos mas recreacion que impren la comida y atencion medical por que muchas personas tenemos mas de 2 años peleando nuestros casos y no los dejan salir para seguir nuestros procesos fuera y no han vendido los de ICE hablar inatives words con nosotros											
Abuse/Discribm inatives words G3/G4 F3/F4 started hunger strike today. Muslim faith is hurting (Ramadan traves suppose to be delivered half an hour before the sunset , but unfortunately today the 10 the of Ramadan our food and drinks or latte every day and we are unable to direct our faith											
Religion											

A	B	C	D	E	F	G	H	I	J	K	L		
173 REDACTED	REDACTED	REDACTED	D2	Pakistan	ENG	03/19/2024	Clothes/Beddi	Laundry from D 2 took away for wash Thursday morning for 70 detainees					
							hasnt come back after wash we are wearing dirty stinky smelly clothes						
							such a mess						
							Hicieron un drill de los incendios y les dijeron que es pura panal para que parezca que hicieron algo. 8:20am hicieron el drill y es una la única vez que lo han hecho. Desde que esta ahí. Solo hablo en inglés y dijeron que salieron rápido. De tenían que traducir una a la otra. No les dijeron que era un simulacro. Hasta les dijeron en voz balita. Entraron los oficiales y les pegaban en la pared en fila para contártas. Hubieron 3 que no salieron y no revisaron si faltaba alguien, si hubiera sido un incendio de verdad se podían haber						
							Abuse/Discrim inutes words	murió. Lleva más de 3 meses pidiendo deportación. La regalo la oficial por la misma pago.					
							un dia les llevaron la comida a las 12. Un dia la carne llega malograda.						
							Food/Comida						
174 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Clothes/Beddi	Una oficial le quito pantalones que porque tenia					
							inutes words	Clothes/Beddi	muchos. Filas tienen que lavar, deben comprar el jabon para lavar la ropa porq				
							eno hay jabon. Tienen zapatos de suela plana y se caen seguido.						
							Food/Comida	Las hacen usar el micro por 8 mins para las 100. Solo sirve un micro y un solo lavabo para todas.					
							Infrastructure						
175 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Communication	A una muchachita le bloquean sus llamadas con su hijo , porque le cuenta lo					
							inutes words	Le amenazaron por quejarse de que los guardias estaban acosando a una					
							Abuse/Discrim inutes words	Abuse/Discrim mujer "bonita y de buen cuerpo", le dijeron que era un chisme de viejas, no le hicieron caso y la amenazaron con ir al hoyo					
176 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de						
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
177 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
178 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
179 REDACTED	REDACTED	REDACTED	C1	100	SP	03/20/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
180 REDACTED	REDACTED	REDACTED	F4	MEXICO	SP	03/20/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
181 REDACTED	REDACTED	REDACTED	C2	500	SP	03/21/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
182 REDACTED	REDACTED	REDACTED	C2	500	SP	03/21/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
183 REDACTED	REDACTED	REDACTED	C2	500	SP	03/21/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
184 REDACTED	REDACTED	REDACTED	C3	500	SP	03/21/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
185 REDACTED	REDACTED	REDACTED	F4	MEXICO	SP/ENG	03/21/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso					
								el sábado pasado les dieron de comer a las 8pm ya van dos veces que esto					
								pasa. Tiene diabetes, su comida tiene que llegar al tiempo					
								Y la lavanderia sigue sin funcionar. Ropa interior, brasier y una playadera.					
								Preguntaron de las sabanas que las cambiaron porque estaban negras y no las					
								quieren cambiar. Las mismas cobijas desde hace 2 meses. Siguen lavando a					
								mano. 11 dias sin lavar la ropa.					
186 REDACTED	REDACTED	REDACTED	H-210		SP	03/22/2024	Clothes/Beddi	Ayer llegó ICE como alias 5pm los sacaron ala yarda los trataron de					
							convencer que comieran y que ellos ya les traerán ropa limpia, que van a ver						
							inutes words	sus casos, mejor atención médica y los van a dejar salir más. Pero que tenian					
							Abuse/Discrim inutes words	Abuse/Discrim que comer pero que ellos siguen tiene en la huerta de hambre. Hay 3					
							Food/Comida	personas con problemas médicos incluido el señor de la marca paso		</			

	A	B	C	D	E	F	G	H	I	J	K
											L
193 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED						
194 REDACTED	REDACTED	REDACTED	REDACTED	D2	Pakistan	ENG	03/26/2024	03/25/2024	03/25/2024	03/26/2024	03/26/2024
195 REDACTED	REDACTED	REDACTED	REDACTED	Released	Released	SP	03/28/2024	03/29/2024	03/29/2024	03/28/2024	03/29/2024
196 REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
197 REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
198 REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
199 REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
200 REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
201 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
202 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
203 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
204 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C3	26	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
205 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	G3	SP/ENG	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
206 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	G3	SP/ENG	03/29/2024	03/29/2024	03/29/2024	03/29/2024	03/29/2024
207 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C1	Honduras	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
208 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C1	Honduras	SP	03/29/2024	03/29/2024	03/29/2024	03/29/2024
209 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	B2	NIGERIA	ENG	03/31/2024	04/02/2024	04/02/2024	04/02/2024
210 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	B1	NIGERIA	ENG	04/02/2024	04/02/2024	04/02/2024	04/02/2024
211 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	F1	7 Mexico	SP	04/02/2024	04/02/2024	04/02/2024	04/02/2024
212 REDACTED	REDACTED	REDACTED	REDACTED	REDACTED							

A	B	C	D	E	F	G	H	I	J	K
227 REDACTED	REDACTED	REDACTED	G3	Nicaragua	SP	04/06/2024		Medical/Médic hepatitis y esta gente ni así me quiere sacar para mi país o para acá , 6 meses detenido		
228 REDACTED	REDACTED	REDACTED	Released	Honduras		04/08/2024		estoy sufriendo ,no se imagina cuánto estoy enfermo de diabetes colesterol, estuve 4 meses en detención, Presenció el intento de suicidio de Lovepreet y dice que se quedó traumado , porque nunca había visto algo así, miro a lovepreet tirado y lo toco y se miraba como muerto y no respiraba, luego los guardias le dijeron q se guitarra. Ahora q regreso del hospital ahora acuña inatives words como un niño, estos últimos días no los dejo dormir y q tira las puertas.		
229 REDACTED	REDACTED	REDACTED	G2	13	El Salvador	SP/ENG	04/09/2024	Abuse/Discrim inatives words les han cancelado la yarda por falta de personal		
230 REDACTED	REDACTED	REDACTED	Released	Afghanistán	ENG	04/10/2024	Estuvo 33 días detenido . Habían alrededor de 60 personas en D2 y en A3 40 personas . El presenció el intento de suicidio de Mahamat Ismail y como se quejó su herma y los otros 4 intentos de otras personas , pero quedó impresionado por Ismail porque es un chico bueno ahora q regresó está muy mal. El es Doctor en su país y piensa que tiene muchas personas con problemas y no les dan tratamiento y tanto encierro les hace más daño si podían cambiar el canal de televisión o si usaban el microondas o cambiarse la pijamas antes de tiempo lo castigaban , les hablaban con groseras .Siempre estaba en insolución lo movían como a un perro , no están mandando , esto es un infierno , oraba siempre para q nos dejaran salir libres , la comidita los enfermaba ,no respeta la religión les obliga a quitarse los turbantes inatives words			
231 REDACTED	REDACTED	REDACTED	Released	India	ENG	04/10/2024	Abuse/Discrim comida los enfermaba ,no respeta la religión les obliga a quitarse los turbantes inatives words			
232 REDACTED	REDACTED	REDACTED	Released	SP		04/11/2024	Food/Comida para comer pero hoy empezaron con eso.			
233 REDACTED	REDACTED	REDACTED	C3		SP	04/12/2024	Queja colectiva del C3 ellas está muy preocupadas porque tienen 7 meses el se cayó de las escaleras de un 2ndo piso , ya puso 4 quejas porque siente inatives words querían ir a su país hay 7 personas en total con deportación final			
234 REDACTED	REDACTED	REDACTED	B2		SP	04/12/2024	Medical/Médic que su mano se quebró y su costilla también le duele . Solo le dan medicina para el dolor y le hicieron un X-ray pero no le han dado respuesta			
235 REDACTED	REDACTED	REDACTED	C1	100	SP	04/12/2024	Money/Dinero comprar a esos precios altos			
236 REDACTED	REDACTED	REDACTED	C1	100	Mexico	SP	04/12/2024	Medical/Médic medicamento para lo que tiene y no lo atienden como debe de ser. A ella le dieron y no lo estaba.		
237 REDACTED	REDACTED	REDACTED	C1	100	Mexico	SP	04/12/2024	Food/Comida Comida muy poca , puros carros.		
238 REDACTED	REDACTED	REDACTED	C1	100	Mexico	SP	04/12/2024	Cleaning/Lim pieza 2 veces al dia pero esta muy sucio.		
239 REDACTED	REDACTED	REDACTED	C1	100	Mexico	SP	04/12/2024	Abuse/Discrim inatives words ya quiere salir deportada , firmó deportación donde que llegó y no la sacan.		
240 REDACTED	REDACTED	REDACTED	C1	100	Mexico	SP	04/12/2024	Medical/Médic está con una alergia en la nariz (granos) y no le quisieron dar una crema , le dijeron que la debe de comprar.		
241 REDACTED	REDACTED	REDACTED	C1	100	South Africa	ENG	04/12/2024	Abuse/Discrim corté con todo a su favor y no la quieren liberar . ICE quiere apilar la desicion inatives words		
242 REDACTED	REDACTED	REDACTED	B1		NIGERIA	ENG	04/14/2024	Abuse/Discrim REDACTED is on Hunger strike this is his 7th day , reason , he's been here for inatives words so long , also the haven't given him access to contact his family in B1		
243 REDACTED	REDACTED	REDACTED	C1	100	South Africa	ENG	04/14/2024	Elia quiere protegerse de una guardia porque la esparvayon un químico de limpieza, estaba mintiendo matria de alguna manera , hay grabacion de eso inatives words		
244 REDACTED	REDACTED	REDACTED			ENG		04/15/2024	Abuse/Discrim pero a pesar de eso ella quiere impunidad (la guardia) , No solo le ha pasado a inatives words		
								Abuse/Discrim Un oficial REDACTED le todo sus partes privadas , llamó a la policía pero no inatives words se pudo contactar , no hay forma de hacer una queja con TPD		

	A	B	C	D	E	F	G	H	I	J	K	L
245	REDACTED	REDACTED	REDACTED	REDACTED	SP	04/15/2024						
246	REDACTED	REDACTED	REDACTED	REDACTED	Fiji	ENG	04/16/2024					
247	REDACTED	REDACTED	REDACTED	REDACTED	Fiji	ENG	04/16/2024					
248	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	C1	SP	04/16/2024				
249	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	SP	04/17/2024				
250	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	SP	04/17/2024				
251	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	ENG	04/17/2024				
252	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	H	South Africa	ENG	04/17/2024		
253	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	H	SP/ENG	04/18/2024			
254	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	F4	Fiji	ENG	04/18/2024		
255	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	F4			04/18/2024		
256	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	F4	Cuba		04/18/2024		
257	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	H					04/18/2024

	A	B	C	D	E	F	G	H	I	J	K	L
281	REDACTED	REDACTED	REDACTED	H	South Africa	ENG	04/29/2024					
282	REDACTED	REDACTED	REDACTED	H			SP	04/30/2024				
283	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
284	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
285	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
286	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
287	REDACTED	REDACTED	REDACTED	Released	Colombia	SP	04/30/2024					
288	REDACTED	REDACTED	REDACTED	Released	Colombia	SP	04/30/2024					
289	REDACTED	REDACTED	REDACTED	Released	Colombia	SP	04/30/2024					
290	REDACTED	REDACTED	REDACTED	Released	Colombia	SP	04/30/2024					
291	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
292	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
293	REDACTED	REDACTED	REDACTED	Released	India	ENG	04/30/2024					
294	REDACTED	REDACTED	REDACTED	G3		SP	05/01/2024					
295	REDACTED	REDACTED	REDACTED	G3	Mexico	SP	05/01/2024					
296	REDACTED	REDACTED	REDACTED	F4	El Salvador	SP	05/01/2024					
297	REDACTED	REDACTED	REDACTED	F4	50	El Salvador	SP	05/01/2024				
298	REDACTED	REDACTED	REDACTED	F4	50	El Salvador	SP	05/01/2024				
299	REDACTED	REDACTED	REDACTED	D2	60	SP	05/07/2024					
300	REDACTED	REDACTED	REDACTED	H		SPIENG	05/08/2024					

Cleaning

2024, Row 6: I have to come here and demand for them (people from India) to fix it right away. that's why they fixed it because this people don't have anybody to speak for them and everyone was giving me complaints they were giving me a lot of complaints when I came here. They were telling me how they were treating them, their TV was being off, they wouldn't talk to them like animals. They cleaned last night who clean this place is them. almost 40 something people is using one restroom one toilet 40 something people is using 1 toilet in this unit 47. I have to I have to do just what I can I have to go clean the toilet then put paper on it then tell everybody clean after you, you know because you know they never been in america so they don't understand about. we are who are cleaning everything we are who cleaned the restroom they said we have to go clean it ourselves. I told them (GEO) to call the cleaners to come and clean yesterday and they said they have no cleaners...I thought G4 I thought the G Units was dirty, this place is worse. they treat people worse then the they treat people worse because this people don't have nowhere to speak up.

2024, Row 21: so the cleaners might come tomorrow but for now no cleaners and the pod is cold I think heather is on but its typically cold

2024, Row 25: For the last 15 days we have 2 toilets where we relieve ourselves, clogged and they don't come to fix them // For peeing there are 3 and for pooping there are 4 but since 2 are clogged we only have 2 at the moment and there are more than 40 people and they always say yes we have reported it and they don't come to fix them.

2024, Row 43: They are having a lot of problems with paper towels, this has been going on forever, they last only three days and then run out, and they take a long time before they give us more. The toilets are clogged again and they are left like this for up to a week.

2024, Row 62: the cleaners only come once a day now with only 2 or 3 workers doing a quick and superficial cleaning.

2024, Row 64: I want to let you know, the cleaning company that comes today only comes once a day to clean, it used to be twice a day.

2024, Row 76: Cleaning has changed, they used to clean twice a day and now only once a day, a week ago five people came in to clean the unit when they used to clean twice a day, now they only come once a day, and there are only two people cleaning.

2024, Row 81: Toilets are broken and not repaired quickly. Has been in detention for 10 months and there is no change.

2024, Row 238: cleaning twice a day but it's very dirty.

2024, Row 259: last month they cleaned 2 times a day and now they only come once a day.

2024, Row 282: the last time they changed cells, it took them 2 hours to clean the ceiling, walls, floor and bed, which is not fair because they don't know if a detainee is sick and then it's spread to them. (They are changed from their cells from time to time and they are not cleaning as they should and they are the ones who have to clean and they're not paid for it, those are the segregation units.)

2024, Row 291: everybody has itching on their body, they don't know if it's from the water, the environment, the blankets

2024, Row 300: They're doing their own cleaning in the cells, since February they have been moved to different cells, they have been moved 5 times. No one comes to clean; you need to clean your own bathroom.

Cleaning/Overcrowding

2024, Row 4: It is my greatest surprise how many people I saw in one unit. A1 has 85 detainees in one unit being hopeless with the facility. I spoke to almost all of them about their concerns. Can you believe that they have been without microwave for 6 straight days. They cleaners only comes once in three or four days. They all complaining about their cases. I have already told them to come and fix this place and they haven't done anything yet. The two microwave here has been faulty for 6 days and the geo officer asked me if I crossed illegally or legally. They cleaned last night who clean this place is them. almost 40 something people is using one restroom one toilet 40 something people is using 1 toilet in this unit 47, we are the ones who are cleaning we are who are cleaning everything we are who cleaned the restroom they said we have to go clean it ourselves. So I have to clean it yesterday I have to clean today again this morning I have hours. I told them to call the cleaners to come and clean yesterday and they said they have no cleaners. I thought G4 I thought the G Units was dirty, this place is worse. they treat people worse then the they treat people worse because this people dont have no nowhere to speak up.

2024, Row 7: 6 bathrooms for 70 people in each unit, they're not cleaning the unit, the food hasn't changed, inhumane treatment, they are treated differently in that unit (he was in G4 and was moved to D2 where he is treated worse)

2024, Row 8: They don't clean, sometimes once a day, sometimes the floor and the bathrooms are filthy. They clean at 10pm, they're told that because they don't have workers in the laundry, they cannot give new underwear, they do not have enough clothes, they complain about that, they are waiting more than 2 months for underwear, the medical is very bad, a girl is waiting for a hernia operation for months. In C1 there are 100 women, several of them from India, she has a friend there, they see each other in the yard and she told her that they only have 4 bathrooms, 9 tablets, 8 phones, and only one officer for all of them, and there are constant fights among them for the use of all that, sometimes even the officer complains that she's shoved because she is the only one who brings them food or gives them what they need, her friend told her that recently, a woman who fainted was taken out and she never came back

2024, Row 109: The hygiene conditions are very bad, there are 80 people in their unit with only 3 bathrooms

Hygiene

2024, Row 202: They need to buy soap at \$6, regularly it's 0.99. You don't get them for free unless you are in the hole where you can shower every 3 days.

2024, Row 235: The commissary is very expensive, you don't get shampoo (\$6) nor soap (\$1.40), you have to buy at those high prices

Sexual Assault/Threats

2024, Row 5: There was harassment in the bathrooms with a female roommate, they opened the shower curtain, said that the girl was very pretty, she reported it and they have already removed her, but I'm afraid.

2024, Row 159: ICE continue to display any empathy towards " sexual assault " victim's in their custody and control. I have continued to raise concerns regarding the findings issued by the Homeland Security for the Office for Civil Rights and Civil Liberties (CRCL) into my sexual assault allegations which ICE/GEO covered up yet ICE AFOD REDACTED don't seems to care about my ongoing safety and mental health concerns.

2024, Row 179: They threatened her for complaining that the guards were harassing a "pretty and shapely" woman, told her it was just gossip, ignored her and threatened her with going to the hole.

2024, Row 244: Officer REDACTED touched her private parts, she called the police but was not able to get through, there is no way to file a complaint with TPD

2024, Row 251: He called on April 15 to follow up on his harassment case, to find out why TPD had not come to take his statement and the officer whose name he does not remember told him that Geo did not let them in, I gave him the non-emergency number to file his report, to write down the time, officer name and case number to see if they respond. On April 2, 2024 REDACTED suffered sexual harassment from Geo. REDACTED reported to Geo on the same day. On April 3 he made a police report case #REDACTED but TPD never came to see him, he then called Resistencia and reported it. Today, April 17 at about 2:10 he called the non-emergency number and asked for his case report and the employee who took his report ID# REDACTED who would not give her name, explained that sergeant REDACTED officer of Geo was the one who told TPD that he is not allowed to enter the center to do investigations. Also added to this case was REDACTED Id: REDACTED, case number REDACTED. All of this is recorded on Geo cameras.

2024, Row 294: A GEO officer put his hand inside her pants and touched her parts, she already filed a formal complaint, he had already done it to someone else, there is video footage from the cameras

Hunger Strike

2024, Row 11: They agreed to start a hunger strike at the beginning of the month to demand better food, decent medical care, medicines and clean clothes.

2024, Row 93: B-3 is on hunger strike. About 60 detainees. Started last night. They said they gonna keep going until they started releasing people who been here for awhile. Health care is very slow, response time us slow, sanitation is bad. Supervisors are not responding on time. Maintenance is not fixing things. Clogged sinks and shower drains are not died for weeks sometimes. Hardly get

cleaning twice a day. Sometimes not even a single time in day. So much more. Vegetarian and non vegetarian food are so bad people depend on commissary for 3 meals. I will talk to you sometime today.

2024, Row 103: B1, B2, B3 and A3 is officially on hunger strike as I write to you. A3 started this morning. Am not aware when the B's started. A2 will start 2mro. We are 90 detainees here and only 11 is not on hunger strike, but the rest is on hunger strike. Too many detainees here now have the tendency of committing suicide because their mental health is getting worst every seconds. This facility is full and their is no bed space anymore book in. It is so noisy we can't even hear someone through the phone anymore. We can't sleep and no one can even read or write. This place is really a slaughter house.

2024, Row 106: After witnessing the suicide attempt, many decided to go on a hunger strike. They are only asking for asylum.

2024, Row 118: Ma'am these people are taking a new measure and this is really getting out of hand pls , So the Geo came in this morning took away the first set of people that started the strike and took them to another pod B3 with the rest of the 76 doing the hunger strike ,now the started taking their personal commissary and putting them in trash bags ,more like if you are on hunger strike we take your commissary. That's what's going on now

2024, Row 162: F4 goes on strike starting today. 46. They will be on strike for 3 days. It's because yesterday in the medical line they were told they would not be given recreation time because of the protests over the death of Mr. REDACTED. They chose to strike because they know we are out there, and they want to support us for everything we do.

Demands: Clothes, medical attention, information about what is going on, turning off the lights at night to be able to sleep. They are still waiting for the man who was taken to the hospital the day before yesterday (who has a pacemaker) REDACTED.

2024, Row 166: They are on a hunger strike, some of their demands are clean clothes, recreation time, they are not allowed to go out to the yard. Right to bail, access to a doctor, immediate deportation for the people who were issued deportation and have been there for more than 5 months, to be treated and have their human rights respected.

2024, Row 169: G4 is on strike and one of the demands is also the right to personal hygiene, they have not had their hair cut for a long time, there is no change of clothes.

2024, Row 180: Yesterday ICE arrived at about 5pm and took them out to the yard and tried to convince them to eat and told them they would bring clean clothes, that they will look at their cases, give them better medical attention and let them go out more, that they had to eat but they were still firmly on the hunger strike. There are 3 people with medical problems, including the man with the pacemaker.

Water Quality/No Clean Water

2024, Row 13: We've had no water for more than an hour and they say they're going to fix it and still nothing. We can't shower, we can't brush our teeth, we can't go to the bathroom, we can't drink water or make coffee because there is no water, Units G1. G2, G3, G4 without water.... water has arrived but it is very dirty and cold.

2024, Row 14: we don't have water and people can't use the toilet and the toilet is filthy, we haven't had water since the morning, as always they don't care about any of this, well this is what is happening.

2024, Row 16: Yesterday they had no water all day until it arrived today but it still comes out very dirty.

2024, Row 34: we have no water since this morning allegedly the plumbing broke down

2024, Row 277: every time you shower the water comes out like with bleach and it dries the skin.

Climate Control Problems

2024, Row 19: Today we woke up to the news that the heater is not on. We all woke up with the cold weather. And up to this hour they still haven't fixed it. Yesterday it was the water, now it's the heater. It is not a coincidence what is happening in this place.

2024, Row 21: so the cleaners might come tomorrow but for now no cleaners and the pod is cold I think heather is on but its typically cold

2024, Row 51: reports that it is cold after 6 pm and they ask for an extra blanket and they don't receive them.

Food

2024, Row 35: the food is tasteless and is served very cold

2024, Row 41: The food situation is very bad, especially for him because he is allergic to onions and peanuts and he only eats fruits like apples and salads they give him, he is not getting any other kind of food, he already told them about his allergy and they told him he had to go to the doctor first but they have not given him any appointment, he is having difficulty communicating or making his appointment because he can't read or write and the guards are very rude to him and don't want to help him. Now he is asking for help from some of the other people in the unit to fill out his paperwork and make an appointment as well, he even has diarrhea because he is not getting any solid food.

2024, Row 59: The food still comes late, dinner is served at 930 and when they complain about why it's so late, they are told that it's because they have no staff.

2024, Row 60: they still bring us the food very late and today they gave us lunch, we got frozen chicken, and they don't give us what is written on the menu.

2024, Row 74: The food is very cold.

2024, Row 85: He is allergic to onions and has test results showing this but he keeps receiving food with onions and sometimes he goes days without eating.

2024, Row 95: Said that the food is still terrible, very cold. They are only giving them potatoes.

2024, Row 100: Found a rock in the food, we have a photo.

2024, Row 149: dinner used to arrive at 6 and now it arrives at 8pm, all meals are 2 hours late and when they ask about it, they are told that it will get there when it gets there.

2024, Row 175: one day dinner was brought at 9:30pm. Instead of 12. One day the meat was spoiled.

2024, Row 181: Last Saturday they were fed at 9pm and this has happened twice now. He has diabetes, his food must arrive on time.

2024, Row 200: the food is late and cold. The ground turkey tastes very bad, stale. Most of the women return the food. There's always food that's past its expiration date.

2024, Row 206: they've found rocks and plastic in the food.

2024, Row 250: they are giving them spoiled milk, this is the second complaint concerning spoiled milk. and a roommate had to go to the hospital because he had pus in his foot.

2024, Row 266: he doesn't have money for food, he has to take medication after dinner, and he gets very hungry and they don't give him extra food

2024, Row 279: the food upsets him and sends him to the bathroom, he thinks he is allergic to the food.

2024, Row 284: The food I was given at the center caused gastritis and made my stomach swell.

2024, Row 288: the chicken is undercooked (this is a common complaint))

2024, Row 298: food is expensive compared to prison, this is robbery.

Clothing/Laundry

2024, Row 61: They don't give us any clothes, they say they don't have any and they give us used, stained and torn clothes.

2024, Row 78: Has not received underwear or clean clothes for 3 weeks.

2024, Row 110: Their blankets haven't been changed in 5 months.

2024, Row 131: Because of yesterday's fire they don't have clothes, they don't know when they will be getting any, they wash it themselves.

2024, Row 135: Right now we don't even have cloths to wear cos there was fire in the laundry room on Thursday.

2024, Row 137: Also, I want to tell you that since Monday, apparently the laundry burned down and they have not come to wash the clothes all these days and there's no more toilet paper and soap for hand washing, no more radio batteries and shavers, they are out of everything lately, I don't know what's going on.

2024, Row 153: They are hand-washing their clothes when they shower. They don't tell them anything about hanging their clothes out. They are told they can wash their clothes. I told them to keep track of the washing time.

2024, Row 156: No clean towels for 2 weeks and were not given clean clothes last Friday.

2024, Row 163: No clothes since Thursday. 6 days without clean clothes.

2024, Row 165: They moved the laundry to a unit that is not designed for that purpose.

2024, Row 173: Laundry from D 2 took away for wash Thursday morning for 70 detainees hasn't came back after wash we all are wearing dirty stinky smelly clothes such a mess

2024, Row 176: One week without clean clothes and the officer took pants from her because she had too many. They have to wash, they have to share the soap when they wash clothes because there is no soap. They have flat soled shoes, and they often fall down.

2024, Row 182: And the laundry service is still not working. Underwear, a bra and a t-shirt. They asked for the sheets to be changed because they were black and they don't want to change them. The same blankets for 2 months. Still washing by hand. 11 days without laundry service.

2024, Row 196: It's very bad, they finally brought sheets, it had been 3 months. And still no blankets. When she asked for blankets, the guard got angry. The clothes are torn. Sheets are worn and dirty, same with the blankets.

Medical

2024, Row 29: They told him he was going to be deported but they've had him there for more than 5 weeks and he was not taking his high blood pressure medicine, he asked to see the doctor, but he has not been seen. He says that he is already losing vision in his left eye because he is not taking the medication and his back hurts, he is 63 years old, he says that the conditions are very bad in the detention center, and they are not respecting his rights as an elderly person and he is asking for a lawyer so he can be deported quickly.

2024, Row 33: He has been detained for 3 months and sent a request to go to the hospital because he might have prostate cancer, his varicose veins are very swollen, and he has not received an answer.

2024, Row 44: He is infected with a foot fungus and it is spreading among the detainees and he has been to the doctor and they only give him a cream, his symptoms are worse and he went back to the doctor and they told him they don't have anything stronger to give him.

2024, Row 52: his lips are cracked and bleeding, he doesn't think it's normal, he asked to be seen by a doctor and they do not help him.

2024, Row 54: They report that the food has been arriving late for 3 weeks now and this means that they cannot take their medication at the right time; when they are called by the nursing staff, they have to take it then and there and it causes a stomachache.

2024, Row 55: She called to let us know that it is 2:20pm and there is no food. She also reports that her roommate has been in surgery for 11 days and they are not consistent with the medication. She was given Tylenol when her record says she is allergic to Tylenol and she had an allergic reaction.

2024, Row 56: She wants to report that she was given Tylenol and is allergic to it, was not given any medication post-surgery. Her allergic reaction was hives on her face and chest pain.

2024, Row 58: He is still sick and has not been able to recover his voice, did not have his inhalers with him, until he rang the bell for help, he was not able to breathe for about 5 minutes, no one came to see him when he was suffocating. He still does not have any taste in his mouth.

2024, Row 66: The dentists are just giving them pills, they're not treating them.

2024, Row 77: Pls I want a video visit a whole lot is happening here, was having chest pain the nurse on duty just gave me Tylenol and asked me to go back to my unit so I can die there .it was when I raised dust that they then call ambulance .was admitted upon arrival bp 195/106

2024, Row 83: wants to report that 5 months ago he had surgery on his left eye and was prescribed steroid eye drops for 4 months, he's been using them for 5 months and filled out a kite to see an eye specialist and was told it was a long process and the only thing he could do is see a regular doctor, and to stop sending in complaints, that the nurse would not see him. He needs glasses and they have not provided them.

2024, Row 97: reports that there are 46 people in the unit and they are getting sick with the flu.

2024, Row 108: Many people are suffering with anxiety, depression, as well as recurrent flus, fevers. Everyone got covid or some other sickness after they were detained, and they keep getting sick because of poor cleaning conditions. The medical care is very lacking, with medical staff saying they're just "doing drama" and refusing to give medicine, only after 2-3 days they give a few pills like tylenol. If they report a fever they get thrown into quarantine for 13 days in a tiny room with no window, so people are afraid to say they have fever. They said this is mental and physical torture. REDACTED fainted last night because of hunger strike, depression, anxiety. and back pain issues. The medical people just gave him a few tablets and said to eat food, he said no I'm on hunger strike. He said it is better to die than to suffer these horrible conditions.

2024, Row 113: They are not giving him the medicine he was taking in prison, they tell him he doesn't need it, he says they did the same thing to the person who died (a neighbor in H). They take too long to give therapy.

2024, Row 120: His breathing machine fails at night too (same thing happened to the detainee who died) He asked for a transfer since January and nothing so far. Has filed complaints. REDACTED was transferred to Texas because of retaliation.

2024, Row 152: his skin is yellow, his eyes are yellow, he has been to the doctor 3 times and they don't give him anything, they tell him he is fine but he feels weak and with a fever.

2024, Row 184: A roommate has a red eye, she was like that for three weeks and was given an appointment for May.

2024, Row 195: He was released. There is a person at the center who has been on dialysis since October 2 and since he arrived, he asked for medical attention. He had stomach pain and blood in his urine and his eyes were yellow and they didn't believe him. In the month of February in the last days Dr. REDACTED was with him to see him urinate. Dr. REDACTED saw him the first week of March, they did blood tests and after the results he was admitted to the hospital, he was hospitalized March 19-27. He was diagnosed with cancer, was hospitalized several days after his release, his blood glucose was over 400.

2024, Row 204: When they go to the psychologist, they recount their conversations, everyone knows. They don't follow the confidentiality or privacy disclosure policies.

2024, Row 207: There is another person with the last name REDACTED (REDACTED). He is losing his vision. He is still there, and he is on dialysis every day, they took him away because there are no plugs to connect the machines he needs, there are many sick people and elderly people there.

2024, Row 212: About a month ago I fell in the yard, they took me to the hospital. The doctor said to keep me on the 1st floor, and they put me on the 2nd floor and I fell and broke my right arm. They told me I had nothing but it's broken, I have cramps and I actually feel a little lump in my chest. One of the doctors thinks it's a broken rib, it's a fracture but they don't want to help me.

2024, Row 220: I have a heart problem instead of giving me bond to go and treat myself all they do is giving me bunch of medication. Last month I went down to the clinic with severe chest pain the nurse gave me Tylenol to take and go back to my unit, but I refused and demanded to go to the hospital which I eventually got admitted with high bp and low potassium and swollen feet. blood pressure was 195/110. I was supposed to follow up with cardiologist but they want to shackle me with restraint and handcuffs with I declined cos am not in prison. well about my health conditions and their selfishness in not letting me go out on bond to treat myself. have told my attorney and my family should anything happen to me they are responsible. They have made here a death trap so they can make money on everybody that gets here. I also have severe lower back problem as a result of abnormal kidney function.

2024, Row 224: I went to washroom last night and I passed out and I hit my head on the floor and it got opened spilled so much blood and the I was on the floor for half and hour nobody help me with anything except one of the detainee helped me to wake me up and with his help got consciousness. And the nurses they were standing there watching me but were not doing anything to help and after that they took me to hospital after 2 hours. There was too much blood 2 towels were drenched with my blood and one sheet there were spots of my blood on it. I got 8 stitches. It all happened because I am stressed alone depressed and hopeless I miss my family so much. I don't want to live here anymore I am in so much pain right now. all my body is so weak. And Ic is doing nothing except lying

2024, Row 226: My health is deteriorating by day ,this are the medications I take daily .cavadelor 40mg twice a day, hydrolozine 50 mg three times a day. lisinopril 40 mg one a day, nifedepine 90 mg one a day, potassium chloride 20 mg a day , aspirins 81mg one a day, omeprazole 20 mg twice a

day, atovastatin 40 mg a day, furosemide 20 mg a day. so tell me how I can manage this many medications while am locked up here. am supposed to see a specialist so they can reduce my medications and control my health conditions but they kept me here just to in slave me for their own monetary gain. all of this medication is on file pls pls I want to be out of here am dying by day I feel very week every day with constant headache also with other traumatic situations. Like anxiety and swollen feet (emphysema)

2024, Row 236: There are sick people and they don't take care of them as they should. She was given angina medication for only 3 days and they told her she was fine and she was not.

2024, Row 246: Today, I wrote REDACTED and REDACTED with issue's related to me being diagnosed with Aspergilloses after a blood test. This has to do with "mold" symptoms. Since January of 2023 no treatment has given to me and I begged them not to get me killed here since I have been dealing with a lot of health issues since this recent diagnosis.

2024, Row 248: the last week of January while playing soccer, he collided with a teammate and his foot became like a ball, he went to the doctor in the center for about 4 months and was told it was nothing, they just gave him pain pills, but 2 weeks ago they took him to the hospital, his blood pressure dropped, he had a fever and could not stand the pain, when he arrived at the hospital they discovered that the lump in his foot had a lot of pus and blood, with blood clots, and they put him on antibiotics.

2024, Row 254: I been diagnosed with "mold infection" in this facility.

2024, Row 271: He has 2 bullet wounds, 1 in his chest lodged in his lung, the other in his arm. He was shot in the arm when he was fleeing in January 10, 2024 from one of the cartels and came to ask for asylum and they sent him to Washington. Every time he feels pain he goes to the infirmary, and they only give him ibuprofen, he went to his first hearing and they told him he didn't have enough evidence to qualify for asylum.

2024, Row 295: He had an accident when he was in prison, weeks later he was transferred to Tacoma and has to use crutches because he has a broken ankle and torn ankle ligaments, they give him pain pills but do not take him to the hospital and he was told that he had an appointment for further treatment but they have not followed up with him.

Solitary Confinement/Retaliation

2024, Row 68: They are going to send him to the hole because they've categorized him as a "prison" security risk, he says he never fought with anyone, he is not violent, not even with the guards, the order comes from REDACTED. The guards are wearing bulletproof vests and gloves so they can hit people. They want to keep him until his case is over.

2024, Row 87: Called with bad news, a black guy who was in the hole hung himself, at 1045 the alarm went off and at 11am he was pronounced dead. Said there is no access to tablets or phones at this time (5pm). REDACTED was charged as a terrorist for being an LR informant.

2024, Row 90: The truth is, the treatment and conditions in the units are very stressful here and if you have suicidal thoughts instead of helping you, they will arrest you and take you to a room and leave you there with no clothes on and an officer is with you 24 hours a day.

2024, Row 104: Geo officers took him to the hole to threaten him for being a witness to the person who tried to commit suicide, they beat him and damaged his mouth to keep him from talking, 4 officers, held him for 30 minutes threatening him.

2024, Row 127: They sent a person to solitary because it is the week of Ramadan and his religion does not allow him to eat or drink anything and they forced him to take his medicine, they opened his mouth and made sure he would take it and when he refused they took him and he's been in solitary for 1 week.

2024, Row 155: The survivor of the suicide attempt, he was the one who fell and broke his leg. REDACTED was the one who ran to help and when security arrived, he accidentally hit a security guard with his hand and was sent to the segregation unit.

2024, Row 168: my son just spoke to me from inside there, he is in zone a1, he told me that now anyone who does not eat or have breakfast is considered rebellious and they put them in the hole, it is a dark room with no communication, no toilet, no bed and it is completely dark, so every time he has breakfast they ask for ID, every time he is going to eat they ask him for his ID again, he did not have breakfast today because he overslept and now at lunch time they are asking him if he was going to be rebellious and not eat, I think there's a lot of pressure with the hunger strike, he said yes he wanted to eat but had not eaten breakfast because he had overslept so they told him that if he stopped eating they were going to put him in the hole as a punishment.

2024, Row 223: He's been in the hole alone since he arrived because he made a comment. They asked him if he needed to see a sociologist and he said he wasn't crazy enough to see a psychologist. They asked him if he had thoughts of suicide and he told them that sometimes life is hard and at times he did, they immediately sent him to solitary and put him in a vest and he never went out again until now. He said the food made him sick since he arrived at the center, his gastritis got very bad, they had him on medication and he had to resist and not eat in order to be seen at the doctor's office.

Violence/Dangerous Conditions

2024, Row 69: there is a detainee who was choked and severely beaten almost to death by GEO officers. He reached out to me to inform resistance about this situation. His A number is REDACTED

2024, Row 71: I've been badly assaulted and brutalized by Geo guards.

2024, Row 72: The GEO guards brutally beat him for refusing to go to segregation because they wanted to accuse him of threatening an officer when he did not do so, there was an officer as a witness and he did not want to respond in their favor. He was taken to a place where no one could see or hear. They took him to segregation very beaten, without medical attention for 30 minutes, a nurse had to see him because he requested it. "I was in segregation for two days. They gave me another write-up for assaulting an officer. [copy at office] REDACTED claimed he was injured...Ever

since this happened, I don't feel safe here anymore. I've been keeping to myself in my bunk area, or making sure I'm around other people. I used to talk to some officers. Now I don't talk to them at all for my own safety. I'm not trying to harm anyone, just standing up for my own rights. I'm not physically okay. I have headaches sometimes and I never used to have them before. I still have back pain. I can't sleep at night anymore. I see myself getting beaten up when I close my eyes. I've gone to mental health and asked for sleeping pills. They said I'm in shock"

2024, Row 132: During the fire they were not taken out of the unit, many were coughing, they have no evacuation protocols.

2024, Row 143: no one has prepared them for another fire, on the day of the fire they quickly turned off the alarms and then turned them back on, they were not told there was a fire.

2024, Row 174: They did a fire drill and he told them that it's just a cover to make it look like they did something. They did the drill at 8:20am and it's the only time they've done it since he's been there. He spoke in English only and told them to get out quickly. They had to translate to one another. They didn't tell them it was a drill. They spoke to them using a low voice. The officers came in and they were hitting them on the wall in a line to count them, there were 3 that didn't come out and they didn't check if anyone was missing, if it had been a real fire they could have died. She has been requesting deportation for over 3 months. Was scolded by the officer for listening to music that she paid for herself.

2024, Row 186: When the fire happened they didn't let him out, they were counting them and the process took longer than normal and they didn't mention anything about the fire until the next day, a few months ago they did a fire drill and it consisted of everyone going out calmly one by one into a long hallway and standing against the wall.

2024, Row 218: Says he asked about the complaint he made about the nurse who hit him in the forehead and was told that ICE is investigating, but the guards told him he was a liar.

2024, Row 285: the guards don't know how to handle the detainees, they use too much force and abuse them.

2024, Row 286: Witnessed when a female guard named REDACTED grabbed a detainee by the neck and used unnecessary force, this guard came in and started pushing people who tried to help REDACTED. I witnessed her hitting detainees and then making false reports against the detainees. This is all on camera. The day of REDACTED's suicide attempt

2024, Row 289: the guards yell a lot, people who don't speak English are treated worse

Suicide Attempts

2024, Row 101: REDACTED hung himself now in my pod just now

2024, Row 102: An Indian detainee in B3 tried to commit suicide two days ago, but thank GOD he was stopped and rushed to hospital same day. He was discharged from hospital in wheelchair and I don't know if he is still here.

2024, Row 105: When the incident happened, with the person hanging himself, instead of the medics arriving, the GEO guards arrived, more than 10 of them, pushing, shoving, repressing, shouting, threatening and beating. They did not want them to speak. If they spoke, it would have been more serious, had they spoken, then "death would come". There are people who have been psychologically affected by what happened (REDACTED was deported or transferred to another detention center after this, as were several others)

2024, Row 123: The remaining detainees are seriously on hunger strike and some are already speaking of committing suicide. We are almost 60 still on hunger strike. Detainees are getting fed up with this modern day slavery. They are saying enough is enough. When people start thinking of suicide, that means the situation is serious. Believe me, worst is soon gonna happen because everyone here has mental issues due to this detention. allot of problems in this facility today. Around 2pm to 3pm. An African detainee REDACTED almost committed suicide by hanging himself, but unfortunately another detainees REDACTED, REDACTED, REDACTED, REDACTED, REDACTED saved his life but he was injured and was rushed to hospital.. The medical and fire department with 20 GEO officers came to the unit and rushed him to the hospital. ICE officer REDACTED came after few hours and promised to release all these names I provided here on Friday if they eat their food now and tomorrow. Furthermore, after few hours, another detainee in A2 try to commit suicide again and was rushed out of their unit. We don't know any update on his health and as am writing this now, REDACTED who tried to commit suicide in A3 is still not back to the unit, but ICE officer REDACTED mentioned his name on people getting released if they eat food.

2024, Row 125: another incident happened again at 11:30pm to 12am on 03/13/2024 Another detainee in my unit A3 just try to commit suicide by hanging and through the rail upstairs but unfortunately he fell off from the top tier almost 10 feet to the floor. He was unresponsive for some almost 40 minutes before the ambulance came and took him out. We don't know how his situation is right now. The medical came but couldn't do anything because they claim that they don't have professionals to help the detainee till the ambulance came. This is getting serious, detainees are crying when the incident happened. They thought he was dead. If nothing is done soon. People will be taking their life one after the other. Three serious attempted suicide happened on 03/13/2024 between A3 and A2 and detainees witness all these incidents. The situation here is getting worse everyday. A3 is still on hunger strike since Monday.

2024, Row 139: Two people in A3 tried to commit suicide, Two people in A2 tried to commit suicide, Two people in B1 tried to commit suicide the day before yesterday and went to the hospital. (recuento) They've been transporting people to the hospital in GEO cars so people outside can't count the number of ambulances leaving here. Now if detainees file grievances, they fire the officer right away

2024, Row 228: He was at the detention center for 4 months, witnessed REDACTED's suicide attempt and says he was traumatized, because he had never seen anything like that, he looked at REDACTED lying there and touched him and he looked like he was dead and not breathing, then the guards told him to move. Now that he's back from the hospital he is acting like a child, these last few days he won't let them sleep and slams the doors.

2024, Row 230: He was detained for 33 days. There were about 60 people in D2 and 40 people in A3. He witnessed the suicide attempt of REDACTED and how he broke his leg and the 4 attempts of

other people, but he was impressed by REDACTED because he is a good guy and now that he is back, he is in bad shape. He is a doctor in his country and believes that there are many people with problems and who aren't getting treatment and so much confinement hurts them even more.

Misc.

2024, Row 23: No hot water since last Friday, today they did not take them out to the yard, they said it's because of a broken pipe, 3 people are sick with fever and cough, they do not want to go to the doctor for fear of being put in isolation, the cleaning staff is there for only 10 minutes and then they leave, there is no heat, it is very cold, they haven't had haircuts for 3 months.

2024, Row 26: they don't have paper towels, the water in the mornings comes out brown like mud, they don't have drinking water, they are afraid to drink the water from the sink, last Wednesday there was no water for a long time, there are 30 to 40 people in that unit, the toilet was clogged until now, when they unclogged it. Today was very cold because they had the air conditioning on and nobody wanted to get up because of the cold.

2024, Row 30: Mrs. REDACTED had high blood pressure, they took her to the hospital because she almost had a heart attack. Mrs. REDACTED reports they are not given sanitary napkins and her period is heavy. They give them bad food which sickens them and they get sick emotionally as well. When she complained she was punished with 4 hours in the hole.

2024, Row 47: Geo wants to make money, they treat us like animals, the food is very bad, the environment is not clean, Geo's employees are rude, people are getting infected with covid.

2024, Row 48: they bring the food very late in the morning, they have to wait until 8 or 8:30 and for dinner and lunch at 2pm or 2:30 the menu is always rice and beans, bologna sandwich, undercooked chicken with blood still on it. They are given used clothing from other inmates that is stained, with holes and a bad smell, and they complained to REDACTED, who is the person in charge of complaints who told them that they do not have new funding, they also asked for new blankets and they were not provided because they do not have any, the nights are very cold. Also, the bathroom curtains have mold.

2024, Row 70: In C2, the water heater has been clogged for 3 days and the water comes out corroded, they called the guard, [sic] the water started to come out, she reports it and they don't pay attention, she told them that hopefully on Monday they will fix it and they don't have water. Monday is a long time to wait, the unit is getting wet, the sink where they wash the dishes, the 2 of them stink. There is water in the ceiling area.

2024, Row 88: So that's why we didn't have a phone line and with the tablet all day yesterday and we asked the guards why we didn't have a line they said they didn't know why (lines were out when the detainee died)

2024, Row 91: This is exactly what I have been complaining about this facility from the onset. There is allot of detainees here with suicide thoughts because of the conditions of this place. This place is

a slaughter house designed to damage souls. There is more to this situation than how they portray it. People are dying slowly emotionally, psychologically, mentally and more in this facility. Detainees comes in normal, and leaves here abnormal. This place is worst than prison and am surprise the world don't even see it. People's mental health are being used for personal gains and profit. GEO is a human slaughter profit company. There is almost 1200 people in this facility now as I write this. In my unit A3 there is 100 bed space and all are full. No social distance, no privacy, and it looks like human trafficking facility. Detainees are humans just like everyone else. Detainees are someone's child, father, husband, wife, friend and helper. You need to see how crowded this place is at this moment. (about the news of person died)

2024, Row 111: They said guards call them "alien", "bodies", treat them not human, not even like animals.

2024, Row 116: The officers are threatening them if they complain or communicate with us.

2024, Row 145: the air smells like monoxide, it's like dark dust, yesterday a person almost fainted around 11:30 but recovered, they don't know if it's because of the foul air.

2024, Row 146: (REDACTED LR) I was just at the recycling plant, they are grinding metal and the air flows to the Det center.

2024, Row 150: the sinks have not been working for 2 weeks, another one is leaking and they have to put toilet paper on it to get some sleep, one person was taken from intake and had to wear the same clothes for two weeks, there is no toilet paper.

2024, Row 154: There's a guard with whom they're almost getting into some kind of beef. They brought a Samoan guard yesterday at 3pm. She started yelling at them not to talk, not to make noise and told them they can't speak Spanish, only English or Samoan. Everyone asked for her to be replaced.

2024, Row 160: I would like to inform you that starting today F-4 is on hunger strike for verity of reasons. All 53 men's are participating with this hunger strike till further notice. We are probably going to be to a subject of retaliation by ICE and GEO for our peaceful protest but it has to be done. The condition is getting worse everyday. CERT gang specifically Officer REDACTED me who is a lead Custody Emergency Response Team targeting detainees with mental health and others who protesting about staff misconduct and other imperative issues. He's coconspirators are REDACTED, REDACTED and Lt REDACTED. I will update you more. We are being silenced and oppressed by ICE and GEO. I feel very helpless and hopeless. One more thing, they transferred those who witnessed the detainee die and all his neighbors Saturday to Texas. They got rid of all the potential witnesses and liabilities. Along with some of the hunger strikers

2024, Row 185: 3 years in detention, thinks maybe REDACTED was beaten and they overdid it and that's why he died. In December they beat another person and put him in solitary for 15 days, pepper sprayed him and then waited 2 months for him to recover and deported him, can't remember his name.

2024, Row 193: went to the dentist yesterday at about 830am and his blood pressure dropped, they quickly called a nurse and there were 4 people in the room including the dentist, the assistant and

the nurse, all women. He was recovering and the dentist told him that he was among women and then hit him in the forehead, we don't know if she did it playfully. He quickly filled out a kite because he felt she crossed the professional line, she touched him without consent and if he had made that comment or hit one of them, he would have been punished by now. (04/03) They are investigating the complaint, but they think he is lying.

2024, Row 205: there are not enough officers for them to get yard time.

2024, Row 229: they've had their yard time cancelled due to lack of personnel

2024, Row 299: Dust has been coming out of the air vents for 3 months, when they complain about it they turn it off but when they turn it back on, it's the same thing.

Religious Accommodations/Food

2024, Row 122: One thing is extremely important for Ramadan for Muslims we are not getting food on time or bit early for our Muslim fasting second day food is late one hour and we are 9 Muslim in D2 missed our faith and disturbed our believed. Here is no any respect of being doing Ramadan ,send me and find me a attorney can do the religious law suit

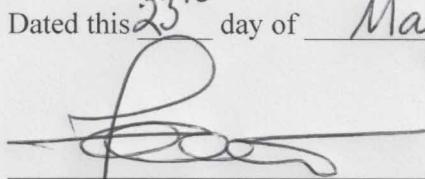
2024, Row 172: Muslim faith is hurting !Ramadan trayes suppose to be delivered half an hour before the sunset , but unfortunately today the 10 the of Ramadan our food and dats or laite every day and we are unable to direct our faith

DECLARATION OF TRANSLATION

I, Fanny Cordero, declare under penalty of perjury under the laws of the state of Washington that:

1. I am over the age of 18 and not a party to this action.
2. I am fluent in English and Spanish, competent to translate documents from English into Spanish and Spanish into English.
3. I have translated the foregoing excerpts of Grievances NWDC_Redacted from Spanish to English to the best of my knowledge, and that said translation is a true and accurate translation.

Dated this 23rd day of May 2024 in Olympia, Washington


Fanny Cordero, Certified Spanish Translator
State of Washington DSHS Translator Certificate #TC4150

APPENDIX 3

No. 24-2815

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

THE GEO GROUP, INC.,

Plaintiff-Appellee,

v.

JAY R. INSLEE, in his official capacity as Governor of the State of Washington;
and ROBERT W. FERGUSON, in his official capacity as Attorney General of the
State of Washington,

Defendants-Appellants

On Appeal from the United States District Court
for the Western District of Washington
Case No. 3:23-cv-05626-BHS

**DECLARATION OF MARU MORA-VILLALPANDO IN SUPPORT OF
BRIEF OF AMICI CURIAE LA RESISTENCIA AND PROF. ANGELINA
SNODGRASS GODOY**

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I, Maru Mora-Villalpando, declare under penalty of perjury of the laws of the state of Washington:

1. I am over the age of 18 and at all times competent to testify as to the contents of this declaration. I am making this declaration based on my personal knowledge of the subject matter herein.

2. I am an advisor with, and one of the founders of, La Resistencia; a grassroots organization that literally started with my phone. People in detention at the then-named Northwest Detention Center (hereinafter NWIPC), would call my phone and I would generally ask them, "What's going on, what do people need to know?" Shortly afterward, I started organizing with people who had been released from NWIPC. Together, we formed La Resistencia in 2014 and recently acknowledged 10 years of advocacy.

3. For the past ten years, La Resistencia has taken on the role of private investigator. If anything happens at the detention center in Tacoma, La Resistencia receives calls from people in detention. We then turn around and try to find out as much information as we can because we know from experience that the facility is not likely to proactively share any information. Aside from fielding calls, we turn to reporters asking them to find out what is going on by their contacting the police. La Resistencia then will organize vigils, protests, campaigns—anything to raise awareness of what is going on behind the detention center walls.

4. Every time people that are detained call me, I always wonder what if it was me? If we don't fight, it could happen to me. It could happen to anyone. And in my mind, that's why La Resistencia exists: because it often feels like no one is paying attention to what GEO is doing every day, so we have to do it ourselves. People are calling La Resistencia and sharing their stories because we have earned a reputation of getting out the information that ICE and GEO do not want the public to know. What started as phone calls to my phone from people in detention has now evolved to three dedicated phone lines where we receive calls and document them. We also get letters from people in detention as well as messages from the family and friends of those detained requesting our support and involvement.

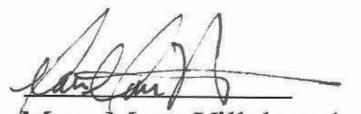
5. While I understand that there is a lawsuit between the Attorney General's office and GEO, that process has not stopped La Resistencia's advocacy. We continue to get phone calls from people in detention, and La Resistencia will continue to investigate and raise awareness. People did not stop existing because a lawsuit was filed, and based on their calls to La Resistencia lately, they certainly did not stop suffering. I understand GEO has been awarded an injunction against Washington State authorities. What this means to La Resistencia, and me, is that we will continue to receive calls and letters from people in detention asking us to raise awareness of what is going on inside GEO's walls.

6. For example, Global Rights Advocacy (GRA), La Resistencia, and Seattle University School of Law, have been providing information to the Inter-American Commission of Human Rights (IACHR) for several years to highlight and bring international attention to experiences of those detained at NWIPC. Our efforts there started during the COVID-19 pandemic and at the request of the IACHR, La Resistencia and its partners submitted over 40 confidential interviews of people detained. Although the focus on the interviews at that time was on COVID-19, the IACHR noted our denouncement of the conditions that existed at the NWIPC prior to March 2020. As reported by the IACHR, the issues ranged from prolonged detention, improper nutrition, abusive commissary prices, lack of proper hygiene, abuse of solitary confinement, both administrative and medical, to the lack of adequate mental and medical care and the hurdles to seek accountability for these problems, among others. A true and correct copy of the IACHR's Resolution 41/2020 is attached as Exhibit A.

7. The GRA, La Resistencia, and Seattle University School of Law have continued to provide the IACHR with updated reports/letters on the conditions at the NWIPC based on in-person interviews conducted with people in detention. True and correct—and redacted—copies of two recent letters submitted to the IACHR summarizing and documenting the interviews conducted at the NWIPC are attached to this declaration as Exhibits B and C. These letters were submitted in

March and May of this year. Names were redacted out of respect for the people detained who had given their permission to use their names in a communication to the IACHR. This demonstrates the ongoing work we are doing to raise awareness.

Signed this 3rd day of June, 2024 at Tacoma, Washington.



Maru Mora-Villalpando

EXHIBIT A



INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 41/2020
 Precautionary measure No. 265-20

Northwest Detention Center regarding the United States of America
 July 27, 2020

I. INTRODUCTION

1. On April 2, 2020, the Inter-American Commission on Human Rights ("Inter-American Commission," "Commission," or "IACHR") received a request for precautionary measures filed by Ms. Alejandra Gonza, from "Global Rights Advocacy," Mr. Thomas Antkowiak, from the International Human Rights Clinic of the Seattle University School of Law, and Ms. Maru Mora Villalpando, from "La Resistencia," urging the IACHR to request the United States of America (the "United States" or "the State") to safeguard the rights to life, personal integrity and health of all the migrants being held at the Northwest Detention Center ("NWDC"), Washington. According to the applicants, the potential beneficiaries face a serious and imminent risk of irreparable harm given the possibility of them being exposed to the COVID-19 virus and the lack of appropriate measures to address the situation while being deprived of liberty.

2. On April 30 and June 23, 2020 the Commission requested information from both parties, pursuant to Article 25.5 of its Rules of Procedure. The applicants replied on May 6 and June 27, 2020. The State submitted a report on June 5.

3. Having analyzed the submissions of fact and law, the Commission considers that the information shows, *prima facie*, that the rights to life, personal integrity and health of the migrants being detained at the NWDC face a serious and urgent situation of irreparable harm. Consequently, it is hereby requested that the United States: a) adopt the measures necessary to protect the rights to life, personal integrity and health of the migrants who are detained at the NWDC. In particular, by ensuring that they have a proper, speedy and accessible access to the appropriate remedies without unnecessary burdens, to assess the continuity of their detention in light of the threat caused by the COVID-19, especially those who are in a high risk category, as described in the Center for Diseases and Control Prevention ("CDC") guidelines. In addition, the State is called upon doubling its efforts in identifying *ex officio* all those who might fall under discretionary release based on medical circumstances while preventing from placing any new such persons at the NWDC; b) adopt the measures necessary to ensure that the potential beneficiaries' detention conditions comply with the applicable international standards, particularly with regards to the threat posed by the COVID-19. In this sense, the State must improve its capacity in effectively preventing the spread of the virus within the NWDC, such as by properly cleaning and disinfecting the facility, as well as providing sufficient sanitary material and guarantee that safety protocols are followed by every person at the facility, among other measures that might be necessary in the present circumstances. Following the above, and in order to ensure social distancing, the State is called upon adopting any measure deemed adequate, such as by sufficiently reducing the number of people being held at the NWDC, prioritizing those who face a greater risk given their personal conditions as indicated above, and allocating available space to adequately enforce social distancing, in light of the recommendations issued by the relevant authorities; and c) adopt the measures necessary to ensure that the detention conditions are generally compatible with the applicable international standards,



particularly concerning sanitation, and that access to medical treatment is guaranteed to the extent prescribed by the respective specialists or physicians.

II. SUMMARY OF FACTS AND LEGAL ARGUMENTS SUBMITTED

1. Information submitted by the applicants

4. The NWDC is a large immigrant detention center in Tacoma, Washington, opened in 2004 and currently operated by the GEO Group, a private corporation under contract with the U.S. Immigration and Customs Enforcement ("ICE"). According to the applicants, the center has a capacity of 1,575 beds and is the dedicated facility for adult immigrants apprehended in Alaska, Oregon, Idaho and Washington, although it also accepts transfers from other ICE locations.

5. Although applicants focused their allegations on the current risk posed by the COVID-19, they also denounced the detention conditions that already existed prior to March 2020. Based on more than 40 confidential interviews with inmates, the issues reported, among others, ranged from prolonged detention, improper nutrition, abusive commissary prices, lack of proper hygiene, abuse of solitary confinement, both administrative and medical, to the lack of adequate mental and medical care and the hurdles to seek accountability for these problems. Furthermore, detainees "had to go on hunger strikes several times to demand better conditions and seek the protection of their health and welfare."¹ Given the above, the Mayor and City Council of Tacoma wrote a letter to the U.S. Congress, which references "breaches of health, safety, civil rights and human dignity in the detention center." Meanwhile, the spokesperson for the Tacoma Police Department indicated that from October 2018 to October 2019, most of the approximately 300 calls to 911 from the facility concerned medical help. It was also said that the police responded to 25 assaults, including sexual assaults and several suicide attempts. Moreover, Governor Jay Inslee called for an immediate and independent investigation following the suspicious death of an asylum seeker at the end of 2018 and to inspect the health and safety conditions at NWDC. The Washington State Attorney General and detainees in a class action also sued GEO Group regarding labor conditions and the State Legislature even considered passing a law to shut it down by 2023, "due to safety, health and human rights concerns, after a nationwide campaign requested the abolishment of civil detention as the best solution." In their last report, applicants stated that the detention conditions persist to date, but that it was extremely hard for the potential beneficiaries to litigate and bring this matter to the attention of a court given many material challenges, despite that concerning labor conditions.

6. Migrants interviewed in January 2020 all shared their concern regarding inadequate and unhygienic facilities and practices, such as a lice outbreak that lasted for two weeks, reports of rashes that appeared after using communally washed clothing, overall poor ventilation, persons finding screws, worms or mold in their meals, diabetic people not receiving an appropriate diet or the difficulty to properly address a chicken pox and mumps outbreak. In relation to the extent of medical attention, applicants included some accounts as an example, such as an alleged excessive reliance on over-the-counter medication as the only treatment for various conditions, generalized fear to speak up and demand a better care, inadequate follow-up, confusing advice regarding their conditions and contradictory diagnosis, even for serious matter such as a detainee that suffered a heart attack in January 2020 and was reportedly given aspirins and vitamins after being released from the hospital. In February 10, 2020 another interviewed claimed that despite suffering from chest pain, severe swelling

¹ The request contains transcripts from some potential beneficiaries.

and Hepatitis C, he believed that officials at the facility will not help him until he is “close to dying, when it will be too late.” Months later, he is apparently still waiting for a liver test and got his shoulder dislocated by guards when he was pulled from his cell. Following his release from hospital, he was allegedly prescribed acetaminophen, a dangerous medication for patients with liver conditions.

7. As for the situation with regards to the COVID-19, applicants reminded that the state of Washington registers (at the time of the filing of the request) the highest death toll in the country and that the NWDC, even when not operating at capacity, constitutes a source of risk given the fact that it offers little ventilation and common spaces are crowded, also stressing the requests for help from Governor Inslee to the federal government to alleviate the overwhelmed state infrastructure. Applicants furthermore indicated that about 75 people began an indefinite hunger strike on late March 2020, following news of other inmates already showing symptoms of COVID-19. One of them was reportedly transferred to a hospital and placed in intensive care. Meanwhile, some accounts state that more detainees have been isolated from the rest and that guards were cleaning their cells; in addition, applicants denounced that testing is very limited, that new arrivals are not properly screened or placed in quarantine and that deportations still continue despite the risk of spreading the virus.

8. Regarding the preventive measures in place, applicants claimed that some pods are already at full capacity (between 50 to 100 people), making social distancing impossible, that only guards are equipped with masks (at least at that time) and that some units do not have hand sanitizer, while dozens of detainees may share limited restrooms and showers, hand soaps and are still crowded in dining and living areas. By the beginning of May 2020, at least 647 hundred immigrants in ICE custody around the nation tested positive, which is more than 50% of the 1,346 people tested. Moreover, applicants informed that approximately only 10 people were released from NWDC by discretion of ICE, a process that has been described as “slow, confidential, without the participation of immigrant lawyers, and lacks any transparency, due process of fairness.” The Tacoma City Council, even requested from ICE Seattle, on April 24, 2020 to “immediately release those who do not pose a public safety risk.” As far as the judiciary is concerned, applicants explained that courts to date have not ordered a release of large numbers of immigrants from the center, the matters being rather assessed on a case-by-case approach, taking into account the high-risk categories established by the CDC. So far, courts are generally reluctant to grant temporary restraining orders (“TRO”) given the fact that, at that time, no official account of positive cases were registered in Tacoma. However, to the applicants’ knowledge, only one person was successful in getting a TRO.

9. In that regard, applicants attached a copy of said decision from the U.S. District Court for the Western District of Washington (“U.S. District Court”), granting a TRO to a petitioner of 66 years old with hypertension and recurrent respiratory infections. The court noted that ICE already acted to decrease the number of detainees held at its detention facilities and performed reviews to consider whether continued detention was appropriate when regarding specific individuals at risk. As a result, the NWDC is reportedly at less than half of its capacity; however, the population within individual housing units was still not appreciably reduced. The court further pointed out that although preventive measures were already in place, they were insufficient to prevent the introduction of the virus by asymptomatic individuals and that GEO is not required to notify ICE if any of its staff members have been tested or diagnosed with COVID-19. Moreover, according to the court,

Immigration detention facilities, in particular, are at a heightened risk as they house a great number of vulnerable detainees, have close living quarters, and have limited capacity for medical care [...]. Social distancing in detention facilities is often impossible as toilets, sinks, and showers are shared, food



preparation and service is communal, and detainees share common areas [...]. Further, staff rotate through the population on a shift basis, providing opportunities for transmission into the facility, especially by asymptomatic carriers. Indeed, “[t]he only way to control the virus [in these settings] is to use preventive strategies, including social distancing.” Accordingly, much focus has been placed on reducing detained populations, and public health experts have recommended that authorities release detained individuals who are at high risk of serious illness or death from COVID-19 [...].

Perhaps the biggest challenge to controlling the spread of COVID-19 is presented by the communal conditions in the [NWDC]. In almost all aspects, life among detainees is a shared experience that does not allow for social distancing [...]. There is no evidence that Respondents have added tables or otherwise made accommodations in response to COVID-19 that would allow detainees to adequately space themselves while eating [...]. While using recreation area, attending immigration court, or seeking medical care and medicine, detainees are again in close contact [...]. Even when detainees retire for the night, they are housed tightly with other detainees, often in bunkbeds [...]. Put simply, the undisputed evidence establishes that maintaining social distance at the [NWDC] is impossible [...]. Respondents present no evidence that professional cleaning occurs within the housing units. Indeed, GEO generally passes on the responsibility for maintaining the cleanliness of its facilities to detainees, and GEO does not always assure that adequate cleaning is performed [...].²

10. On June 3, 2020 the U.S. District Court issued an order, converting the above TRO into a preliminary injunction.³ According to the ruling,

Respondents have done nothing to alter the Court’s conclusion [in the TRO]. Respondents attempt to argue that Petitioner is not high-risk because he does not suffer from additional health risks. But, even if this argument was not belied by the record, Petitioner is over the age of 65 [...]. Likewise, Respondents have [...] failed to mitigate the risk of the coronavirus entering and spreading within the [NWDC]. As noted previously, the risk is heightened as Respondents now house a COVID-19 positive detainee at the [NWDC]. While Respondents may have acted to reduce populations within housing units and reduce cross-contact between housing units, social distancing remains impossible, 11 guards are not required to wear masks, and cleaning is inconsistent. Further, Petitioner presents additional expert testimony – consistent with the testimony of his earlier experts – indicating that ICE’s guidance for responding to the pandemic, as applied at the [NWDC], is insufficient to prevent the infiltration of the coronavirus.⁴

11. In their latest report, applicants indicated that, according to some numbers shared by ICE to the courts in early June 2020, the authorities are holding either 561, 564 or 570 at the NWDC, while gathering some details from testimonies concerning their allocation within certain units.⁵ They further claimed that although the center is operating at half its capacity,⁶ as of itself that does not cast away the existence of a situation of risk. Indeed, they indicated, for instance, that ICE and GEO employees are “constantly” coming in and out and moving around the center without wearing masks and that hygiene

² U.S. District Court for the Western District of Washington, *Rafael Pimentel-Estrada v. William P. Barr, et. al.*, Case NO. C20-495 RSM-BAT, order granting motion for temporary restraining order, April 28, 2020.

³ According to U.S. law, while a TRO has a limited short-term duration and is more expedite, it may be converted into a preliminary injunction to maintain the status quo until the court can adjudicate the claims on the merits: “The standard for issuing a TRO is the same as the standard for issuing a preliminary Injunction [...]. “The proper legal standard for preliminary injunctive relief requires a party to demonstrate (1) ‘that he is likely to succeed on the merits, (2) that he is likely to suffer irreparable harm in the absence of preliminary relief, (3) that the balance of equities tips in his favor, and (4) that an injunction is in the public interest.” See above, at 22.

⁴ U.S. District Court for the Western District of Washington, *Rafael Pimentel-Estrada v. William P. Barr, et. al.*, CASE NO. C20-495 RSM-BAT, order converting temporary restraining order into preliminary injunction, June 3, 2020.

⁵ C2-21, F3-42, F1-32, C3-35, G1-12, G2-23, D3-5.

⁶ According to the applicants, “[t]he reduction is certainly not the result of a massive release of people at risk, after a case by case review, that the U.S. Government reports to the Commission. Current numbers respond to the border closure, the implementation of the remain in Mexico policies, the reduction of daily arrests, and a reckless deportation of people to other countries and detention centers in the nation.”

measures are still not sufficient to address the issue. Despite the above, the State did not disclose to the Commission the number of cases being revised at the NWDC, in addition to the fact that, according to the applicants, only 6 people were released under ICE's discretionary policy to decongest the population on humanitarian grounds. They even claimed that that revision is not carried out *ex officio*, but rather once potential beneficiaries with underlying medical conditions file a motion before ICE, which places a heavy burden on them given the paperwork needed and the lack of proper legal representation, especially when they need to sue ICE and litigate.

12. As an example, applicants shared the situation of a woman who was 65 years old, with a heart condition and several illnesses, whose TRO was denied. She was assisted by a pro-bono lawyer to file for parole or discretionary release and, despite submitting medical documentation and other pieces of evidence, her request was apparently denied without a clear motivation. She now uses a (broken) walker after having fallen and broken her knee, in need of surgery and living in fear of contracting COVID-19, to the extent that she avoids medical assistance to prevent being moved to another pod.

13. In relation to the preventive measures put in place by the authorities, applicants stressed some of the findings made by the court in the successful TRO, noting that ICE failed to release a significant number of people who did not have criminal convictions or charges against them. Applicants did refer to other 4 TRO that were denied with regards to individuals with underlying medical conditions, noting that those succeeding *Pimentel* did not dispute the persistence of the detention conditions, albeit clarifying that the denials were based on other considerations, such as the extent of the underlying medical conditions or the fact that, after more testing was carried out at NWDC, only 1 positive case was detected. Yet, applicants, referred to ICE's website, according to which, to date, there are 5 confirmed cases, with 2 of them currently under monitoring.⁷ They also questioned the fact that the testing was actually comprehensive, that being a main factor relied upon by the courts to deny said TRO, since dozens of potential beneficiaries refused to be tested out of fear or that guards were not tested as well, among other issues. In that regard, they added the fact that some TRO were not granted given the lack of confirmed cases at that time, or that there was only 1 confirmed.

14. Furthermore, applicants mentioned that potential beneficiaries were given a mask only on a weekly basis, despite them wearing out, and that ICE and GEO guards are not following safety protocols, such as moving around without masks even in locked down and quarantined pods (images were provided). As to the cleaning and disinfection, they reported that cells and bathrooms were not regularly cleaned, stressing that that task is being carried out by the potential beneficiaries themselves (without proper equipment or gear), who in turn refuse to do it for fear of contracting the virus. Guards do disinfect, but the chemicals they used allegedly cause eye and skin irritation, rashes, coughing and nose bleeding to some detainees.

15. Finally, applicants indicated that on June 18, 2020 a bill named Dismantle Mass Incarceration For Public Health Act of 2020⁸ was introduced in Congress and would include the release of immigrants in detention centers, which constitutes according to them "[...] one of the boldest efforts yet to tackle mass incarceration amid the pandemic [...]."

⁷ See: ICE Detainee Statistics at <https://www.ice.gov/coronavirus>

⁸ See: <https://www.congress.gov/bill/116th-congress/house-bill/7281?s=1&r=6>

2. Reply submitted by the State

16. The State initially replied by claiming that the U.S. District Court was seized with this same matter and concluded that petitioners failed to demonstrate the likelihood of irreparable harm in relation to the risks of their ongoing detention at NWDC during the COVID-19 pandemic. The State considers that the court's findings are relevant in the present case for the following reasons. First, it shows that potential beneficiaries are actively seeking judicial remedies in the United States "[...] which, if successful, could confer the benefits they ask the Commission to confer," thus claiming that the IACtHR should not intervene in these circumstances. Second, it noted that the irreparable harm standard used by domestic courts parallels that set forth in Article 25 of the Rules of Procedure and hence the determination done by the U.S. independent judiciary "[...] should be granted deference where the Commission is being asked to apply the same test but reach the opposite conclusion."⁹ Third, the relevant authorities have already adopted the necessary measures to safeguard the potential beneficiaries' rights, as detailed above.

17. ICE is reportedly taking important steps in that direction and to detect and mitigate the spread of the virus, while regularly updating its protocols according to the CDC's guidance and referring staff and contractors to them. On April 10, 2020 it issued the Pandemic Response Requirements ("PRR"), which established mandatory requirements to be adopted by all the facilities, as well as best practices.¹⁰ According to the State, the PRR "[...] was developed in consultation with the CDC and sets forth expectations and assists ICE detention facility operators with sustaining detention operations, while mitigating risk to the safety and well-being of detainees, staff, contractors, visitors and stakeholders due to COVID-19."

18. To that end, ICE continues to evaluate the potential beneficiaries and makes custody determinations on a case-by-case basis, pursuant to the applicable legal standards, weighing both mitigating and aggravating factors, with due consideration of public health issues. More specifically, it explained that a higher risk for serious illness from COVID-19, based upon the CDC factors, is a relevant factor in determining whether a person may be released; however, that applies only to those who are subject to discretionary detention; indeed, the Immigration and Nationality Act precludes release of aliens placed in mandatory detention in some circumstances, even during a pandemic. As of April 25, 2020 ICE overall released more than 900 aliens, after considering their medical issues, immigration histories, criminal records, potential threat posed to the public, flight risk and national security concerns.

19. With regards to the detention conditions at NWDC, the State stressed that all facilities are bound by strict detention standards to ensure that detainees remain safe, secure and in a humane environment, thus allowing for consistency of operations, management expectations and accountability for compliance with CDC and medical requirements, together with a culture of professionalism. In the case of the NWDC, those standards are set forth in the ICE's Performance Based National Detention Standards 2011¹¹ and the service provider is required to obtain and maintain the American Correction Association accreditation, which provides for an independent review and determination of compliance with standards recognized by the courts and state and local governments. Moreover, the State noted that ICE's standards were developed in consultation with civil rights groups and incorporates many of the

⁹ The State attached to its report a copy of two decisions denying TRO, from March 19 and April 18, 2020.

¹⁰ See: <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>

¹¹ See: <https://www.ice.gov/detention-standards/2011>



recommendations made by the United Nations High Commission for Refugees, among other international organizations.

20. According to the State, ICE is committed to providing comprehensive medical care for everyone in its custody, which includes an initial health screening, 24/7 access to emergency care and treatment by specialists, when appropriate, even during the pandemic. In the event of a confirmed COVID-19 case with mild symptoms and no need for higher level of care, the detainee will be managed in a medical housing by on-site health care professionals. However, those that present a greater risk are transferred to a hospital with advanced coordination.

III. ANALYSIS OF THE ELEMENTS OF SERIOUSNESS, URGENCY AND IRREPARABLE HARM

21. The precautionary measures mechanism is part of the Commission's function of overseeing member states' compliance with the human rights obligations set forth in Article 106 of the Charter of the Organization of American States. These general oversight functions are set forth in Article 41(b) of the American Convention on Human Rights and in Article 18(b) of the IACtHR Statute; the precautionary measures mechanism is described in Article 25 of the Commission's Rules of Procedure. According to that Article, the Commission issues precautionary measures in situations that are serious and urgent, and where such measures are necessary to prevent irreparable harm to persons.

22. The Inter-American Commission and the Inter-American Court of Human Rights (hereinafter the "Inter-American Court" or "I/A Court H.R.") have consistently held that precautionary and provisional measures have a dual nature: precautionary and protective. Regarding their protective nature, the measures seek to avoid irreparable harm and preserve the exercise of human rights. Regarding their precautionary nature, the measures have the purpose of preserving a legal situation being considered by the IACtHR. Their precautionary nature aims at preserving those rights at risk until the petition in the Inter-American system is resolved. Its object and purpose are to ensure the integrity and effectiveness of the decision on the merits and thus avoid infringement of the rights at issue, a situation that may adversely affect the useful purpose (*effet utile*) of the final decision. In this regard, precautionary measures enable the State concerned to fulfill the final decision and, if necessary, to comply with the ordered reparations. As such, for the purposes of making a decision, and in accordance with Article 25(2) of its Rules of Procedure, the Commission considers that:

- a. "serious situation" refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the inter-American system;
- b. "urgent situation" refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and
- c. "irreparable harm" refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

23. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt. Rather, the assessment of the information provided as to whether the requirements of seriousness and urgency are met must be determined under a *prima facie* standard of review.¹² Moreover, it is neither called upon to find any

¹² In that regard, for instance, in relation to the provisional measures, the Inter-American Court has considered that this standard requires a minimum of details and information that allow for the *prima facie* assessment of the situation of risk and urgency. I/A Court H.R., *Matter of the*

criminal or personal liability in the present matter nor to establish any international responsibility of the State. The above analysis thus exclusively refers to the existence of a situation of seriousness and urgency of irreparable harm, an examination that can be accomplished without addressing the merits of a potential petition or case.

24. In relation to the requirement of seriousness, the Commission notes that, notwithstanding the fact that the potential beneficiaries are placed in immigration detention and the existence of international standards in that regard (*vid. infra* para. 32), they are nevertheless still deprived of liberty.¹³ Hence, it is worth recalling that the State is in a special position of guarantor, inasmuch as the penitentiary authorities have full control and command over the persons who are subject to their custody.¹⁴ This is due to the relation and unique interaction of subordination between the person deprived of liberty and the State, characterized by the particular intensity with which the latter can regulate their rights and obligations. Indeed, the very circumstances of imprisonment prevent persons deprived of liberty from satisfying on their own a series of basic necessities that are essential for the development of a dignified life.¹⁵

25. Given the emergence of a pandemic caused by the spread of COVID-19, the Commission further issued Resolution 1/2020 "Pandemic and Human Rights in the Americas today,"¹⁶ where it specifically recommended a series of measures to be taken with regards to persons deprived of liberty. To the extent applicable to the present situation, attention may be drawn, *mutatis mutandis*, to the need of reducing the overall population in detention facilities, exploring alternatives to the deprivation of liberty while prioritizing those who present a greater risk given their personal conditions, and ensuring proper food, health, sanitation and medical care, among others.¹⁷ Moreover, when tackling serious situations that posed an imminent threat to persons deprived of liberty, as a result of their detention conditions, the Commission specifically requested States to reduce overcrowding, considering the closely related risks that were thereafter caused by it, including the spread of infectious diseases,¹⁸ although it must be stressed here that the NWDC certainly does not show a situation of overcrowding (*vid. supra* para. 11).

children and adolescents deprived of their liberty in the "Complexo do Tatuapé" of the Fundação CASA. Request for extension of precautionary measures. Provisional Measures regarding Brazil. Resolution of the Inter-American Court of Human Rights of July 4, 2006. Considerandum 23.
Available at: http://www.corteidh.or.cr/docs/medidas/febem_se_03.pdf

¹³ The Commission has defined it as "[a]ny form of detention, imprisonment, institutionalization, or custody of a person in a public or private institution which that person is not permitted to leave at will, by order of or under *de facto* control of a judicial, administrative or any other authority, for reasons of humanitarian assistance, treatment, guardianship, protection, or because of crimes or legal offenses. This category of persons includes not only those deprived of their liberty because of crimes or infringements or non-compliance with the law, whether they are accused or convicted, but also those persons who are under the custody and supervision of certain institutions, such as: psychiatric hospitals and other establishments for persons with physical, mental, or sensory disabilities; institutions for children and the elderly; centers for migrants, refugees, asylum or refugee status seekers, Stateless and undocumented persons; and any other similar institution the purpose of which is to deprive persons of their liberty." IACtHR, *Human Rights of Migrants, Refugees, Stateless Persons, Victims of Human Trafficking and Internally Displaced Persons: Norms and Standards of the Inter-American Human Rights System*, OEA/Ser.L/V/II. Doc. 46/15 31 December 2015, para 385. Available at: <http://www.oas.org/en/iachr/reports/pdfs/HumanMobility.pdf>

¹⁴ I/A Court. *Caso Mendoza et al Vs. Argentina*. Preliminary objections, merits and reparations). Judgement from May 14, 2013. Series C No. 260, para. 188. Also see: IACtHR, Report on the Human Rights of Persons Deprived of Liberty in the Americas, December 31, 2011, para. 49.

¹⁵ IACtHR, *Report on the Human Rights of Persons Deprived of Liberty in the Americas*, December 31, 2011, para. 49 y ss.

¹⁶ IACtHR, *Pandemic and Human Rights in the Americas today*, Resolution 1/2020, April 10, 2020. Available at: <http://www.oas.org/en/iachr/decisions/pdf/Resolution-1-20-en.pdf>

¹⁷ IACtHR, *Pandemic and Human Rights in the Americas today*, para. 45-48.

¹⁸ See, for instance: IACtHR, *Civil Penitentiary of Port-au-Prince regarding Haiti* (PM-125-17), Resolution 13/2017 from May 26. Available in Spanish at: <http://www.oas.org/es/cidh/decisiones/pdf/2017/13-17MC125-17-HA.pdf>; IACtHR, *Police Coordination Center José Francisco Bermúdez regarding Venezuela* (PM-260-16), Resolution 26/2016 from April 26. Available in Spanish at: <http://www.oas.org/es/cidh/decisiones/pdf/2016/MC260-16-Es.pdf>



26. In the present matter, the Commission finds that the requirement of seriousness is met. To make this determination, the analysis first focuses on the amount of threat currently posed by the COVID-19 and whether the actions adopted by the relevant authorities are sufficient to mitigate the risk in question. To that end, as it has been pointed out by the applicants themselves in the request, the United Nations Special Rapporteur on Migrants, together with other Special Procedures, sent out an urgent appeal on April 27, 2020 with regards to the NWDC, requesting the State to release migrants "held for processing" from COVID-19 high-risk detention centers, explore alternative measures and guarantee access to health care, among others.¹⁹ The Commission understands that the above is relevant to the extent that it constitutes one of many indicia suggesting that the NWDC is indeed facing a serious situation of risk. Second, authorities both at the local and state level have already recognized the worrisome conditions in which the potential beneficiaries were being held since at least 2018, which even caused the legislature to consider a bill to have it shut down (*vid. supra* para. 5). Although the Commission assesses the fulfillment of the requirements set forth in Article 25 of the Rules of Procedure with autonomy, due consideration is given to the statements made by relevant authorities as yet another piece of indicia and, absent any information to the contrary – particularly, taking into account the fact that the State did not reply to the Commission's last request for information, which also addressed that specific matter –, it deems that said conditions continue to exist to date. Another concerning information regards the fact that dozens of potential beneficiaries reportedly began an indefinite hunger strike, which in itself reflects the point at which the situation has evolved, particularly because of the State's apparent unsatisfactory response to the handling of the COVID-19 in the facility.

27. In this regard, the Commission has indeed paid attention to the information contained in the different TRO, preliminary injunction and other orders issued by the U.S. District Court and its considerations (*vid. supra* para. 9 and 10), given the fact that it allowed to gain access to a close assessment of the situation at NWDC, among other documents or testimonies. In relation to this, it appears that despite ICE having implemented a number of measures to prevent the spread of COVID-19 and provide medical care, the potential beneficiaries still face an actual threat to their rights to life, personal integrity and health, since the actions taken in some instances were deemed to be insufficient, in the manner described by the court. It is also worth pointing out that the successful preliminary injunction has a limited scope in the sense that, according to the applicants, to date no judicial order to release large numbers of immigrants exists, having the detainees to allegedly request immediate protection on an individual basis, further noting that most of the TRO were actually denied.

28. The Commission salutes the recent introduction of a bill seeking to significantly diminish population in detention centers, which would include those for immigration purposes, noting that it is consistent with the recommendations stated in Resolution 1/2020 above quoted. In that regard, while clarifying that it is improper to analyze within the precautionary measures mechanism the compatibility of domestic immigration laws with international standards or otherwise dictate policy, the Commission deems useful to consider these aspects in order to determine the extent to which sufficient or adequate remedies exist so as to mitigate the situation of risk, in light of the requirement of seriousness. Similarly, in analyzing the potential beneficiaries' detention conditions, it is important to take into account the many challenges currently and usually faced by them in trying to successfully litigate before domestic courts as well as those encountered by applicants in gathering and accessing all the necessary information.

¹⁹ United Nations, Office of the High Commissioner for Human Rights, "US: Migrants 'held for processing' should be released from COVID-19 high-risk detention centres." Available at: <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25827&LangID=E>

29. The Commission does not possess any additional information concerning the measures U.S. courts adopted to address this situation but understands that the discretionary release procedure carried out by ICE presents a series of obstacles and that, according to the information provided by the applicants, the number of confirmed cases of COVID-19 did increase after the preliminary injunction was rendered on June 3, 2020 precisely on the grounds that the relevant authorities “[...] have done nothing to alter the Court’s conclusion [...]” and have “[...] failed to mitigate the risk of the coronavirus entering and spreading within the [NWDC].” (*vid. supra* para. 10). This is particularly important, given the fact that, according to the available information, prevention is the key measure when tackling the COVID-19. In other words, while the State indicated that those detainees with more severe symptoms are given the proper medical care, because of the nature of this disease that may indeed be mandated but not sufficient as of itself under the current applicable standard set forth in Article 25 of the Rules of Procedure. To the extent that subsequent medical treatment may address additional complications as depending on previous conditions, to fully and adequately mitigate the factor of risk in this situation, the Commission understands that for the present purposes stress must be put on proper prevention measures.

30. The Commission reminds that it is not here in a position of reviewing the factual determinations made by local courts or verifying the implementation of their orders and judgments. As indicated earlier, particular attention is paid to the information therein contained to the extent that it purportedly is a reliable piece of indicia for *prima facie* purposes, while recognizing that some outcomes or findings may be a result of the application of specific legal domestic standards. Here, the Commission understands that courts earlier found that there neither were no confirmed cases of COVID-19 nor sufficient conditions to support that the measures implemented by the relevant authorities were insufficient to safeguard the petitioners’ rights. Yet, acknowledging applicants’ allegations, it appears that not only additional positive cases were registered at NWDC but that the measures implemented to date are still insufficient for the current purposes. In addition, individual cases reported in this request (*vid. supra* para. 12) seem to show that potential beneficiaries may not necessarily receive all the appropriate medical care or consideration, especially in the context of this pandemic.

31. In relation to the above, the Commission considers that it is important to stress the subsidiary nature of the Inter-American System. In particular, it has stated that, in light of the principle of complementarity, international jurisdiction indeed “reinforces” or “complements” national jurisdictions, although without replacing them.²⁰ For a claim based on said principle to be successful, the actions adopted by the State must have been sufficient so as to find that the potential beneficiaries of a precautionary measure do not face a serious and urgent risk of irreparable harm anymore, due to its substantial reduction as a consequence of the local authorities’ intervention. Therefore, although the Commission understands that detainees held at the NWDC may have access to similar judicial recourse, at this very moment it is unclear whether all those who might be more vulnerable to the virus are adequately protected or that the State has sufficiently implemented preventive measures. Moreover, it is

²⁰ In that regard, the Preamble of the American Convention established that the human rights “justify international protection in the form of a convention reinforcing or complementing the protection provided by the domestic law of the American States.” The Inter-American Court had indicated, in regard to this principle and its application in provisional measures that it “is equally applicable in the adoption of provisional measures and its continuance, as, by being in the preamble of the American Convention, it shall guide the actions of the States when a situation of extreme seriousness, urgency and danger of irreparable damage is claimed for the persons who are the users of the Inter-American System of Protection of Human Rights. Therefore, it is not only in contentious cases, but also in the matter of the provisional measures mechanism, the system of protection established by the American Convention does not replace national jurisdictions, but it complements them.” IHR Court. Case of the Rochela Massacre v. Colombia. Provisional Measures. Resolution of the Inter-American Court of Human Rights of February 16, 2017, para. 42.

worth pointing out that the same situation may continue to arise insofar new migrants continue to be detained at the NWDC in these conditions. It is also worth reminding that when granting precautionary measures with regards to the “Zero-Tolerance” Policy, the Commission heavily relied upon the application of the principle of complementarity, in the sense of analyzing whether the intervention of domestic federal courts was sufficient to properly mitigate the situation of risk in question.²¹

32. In relation to the scope and subject matter of the present resolution, the Commission stresses that, as it was already stated in the matter of *Rael Ferrer-Mazorra et al. v. United States*,²² the principle of exceptionality in immigration detention calls for the establishment of a presumption of liberty, rather than of detention,²³ the contrary being incompatible with the object and purpose of Articles I and XXV of the American Declaration of the Rights and Duties of Man (“American Declaration”).²⁴ Furthermore, in its Report on Immigration in the United States,²⁵ the Commission emphasized that detention “is only permissible when a case-specific evaluation concludes that the measure is essential in order to serve a legitimate interest of the States and to ensure that the subject reports for the proceeding to determine his or her immigration status and possible removal. The argument that the person in question poses a threat to public safety is only acceptable in exceptional circumstances in which there are certain indicia of the risk that the person represents.”²⁶

33. Notwithstanding the above, and acknowledging applicants’ specific requests,²⁷ the Commission also reminds that the precautionary measures mechanism may not prejudge on the merits of any potential petition or case, and that the granting of said measures is not justified in circumstances in which the right in question is not deemed to be irreparable. In this sense, although applicants argued that the detention of immigrants at the NWDC violates international standards, that determination is improper here, as well as requesting that all of them be immediately released, a decision more suited to be taken by the relevant domestic authorities, which cannot be substituted by the Commission. In addition, while recognizing the risk caused by the COVID-19 virus, the information currently available suggests that not all potential beneficiaries may face it to the same extent, meaning that the seriousness depends upon the likelihood of suffering a harm that is irreparable in nature. To the Commission’s knowledge, that class in question is to be determined by the relevant medical authorities and guidelines, particularly the CDC in the present matter, as it has already been adopted by national courts and other authorities. Notwithstanding the aforementioned, the Commission finds that the overall population at NWDC also face a situation of risk as a result of the detention conditions that already existed before the spread of the COVID-19 and allegedly continue to exist to date, as reasoned *supra*.

²¹ See: IACtHR, *Migrant Children affected by the “Zero Tolerance” Policy regarding the United States of America* (MC-731-18), Resolution 64/2018 from August 16, para 19 and following. Available at: <http://www.oas.org/en/iachr/decisions/pdf/2018/64-18MC731-18-US-en.pdf>; also, IACtHR, *Vilma Aracely López Juc de Cac and others regarding the United States of America* (MC-505-18), Resolution 63/2018 from August 16, para. 20 and following. Available at: <http://www.oas.org/en/iachr/decisions/pdf/2018/63-18MC505-18-US-en.pdf>

²² IACtHR, Report on Admissibility and Merits No. 51/01, Case 9,903, *Rafael Ferrer-Mazorra et al. (The Mariel Cubans)* (United States). April 4, 2001.

²³ IACtHR, *Human Rights of Migrants...*, para. 391.

²⁴ IACtHR, *Rafael Ferrer-Mazorra et al. (The Mariel Cubans)* (United States), para. 219.

²⁵ IACtHR, *Report on Immigration in the United States: detention and due process*, OEA/Ser.L/V/II. Doc. 78/10, 30 December 2010. Original: English. Available at: <http://www.oas.org/en/iachr/migrants/docs/pdf/Migrants2011.pdf>

²⁶ IACtHR, *Report on Immigration in the United States: detention and due process*, para. 39

²⁷ “This warrant, at a minimum, the following urgent actions: a) the release of all immigrants at the NWDC, as soon as reasonably possible; b) the immediate release of those detained immigrants who are particularly vulnerable to COVID-19, because of their age or physical condition, and those experiencing an urgent medical problem; c) the halt of immigration detention and deportation during the health crisis, and the concession of humanitarian visas d) to allow family reunification; g) the provision of access to medical care for immigrants with COVID-19; and h) the investigation of ICE and GEO management of the COVID-19 pandemic at the NWDC.”

34. Therefore, the Commission holds that the available information *prima facie* shows that the potential beneficiaries face a serious and urgent risk of irreparable harm to their rights to life, personal integrity and health.

35. As it refers to the requirement of urgency, the Commission concludes that it is equally fulfilled, given the reasonable likelihood of the COVID-19 further spreading within the facility, according to the allegations and evidence submitted in the request, coupled with an apparent lack of sufficient and appropriate measures to effectively safeguard the potential beneficiaries' rights. In this sense, it must be stressed that persons belonging to more vulnerable categories face an even more imminent threat.

36. Regarding the requirement of irreparable harm, the Commission deems it met, to the extent that the possible violation of the right to life and personal integrity constitutes the maximum situation of irreparability.

IV. BENEFICIARIES

37. The Commission declares that the beneficiaries of this precautionary measure all those migrants who are detained at the NWDC, a sufficiently determinable class as per Article 25.3 of the Rules of Procedure.

V. DECISION

38. In light of the foregoing considerations, the IACHR considers that this matter meets *prima facie* the requirements of seriousness, urgency and irreparability set forth in Article 25 of its Rules of Procedure. Consequently, it is hereby requested that the United States:

- a) adopt the measures necessary to protect the rights to life, personal integrity and health of the migrants who are detained at the NWDC. In particular, by ensuring that they have a proper, speedy and accessible access to the appropriate remedies without unnecessary burdens, to assess the continuity of their detention in light of the threat caused by the COVID-19, especially those who are in a high risk category, as described in the CDC guidelines. In addition, the State is called upon doubling its efforts in identifying *ex officio* all those who might fall under discretionary release based on medical circumstances while preventing from placing any new such persons at the NWDC;
- b) adopt the measures necessary to ensure that the potential beneficiaries' detention conditions comply with the applicable international standards, particularly with regards to the threat posed by the COVID-19. In this sense, the State must improve its capacity in effectively preventing the spread of the virus within the NWDC, such as by properly cleaning and disinfecting the facility, as well as providing sufficient sanitary material and guarantee that safety protocols are followed by every person at the facility, among other measures that might be necessary in the present circumstances. Following the above, and in order to ensure social distancing, the State is called upon adopting any measure deemed adequate, such as by sufficiently reducing the number of people being held at the NWDC, prioritizing those who face a greater risk given their personal conditions as indicated above, and allocating available space to adequately enforce social distancing, in light of the recommendations issued by the relevant authorities; and



- c) adopt the measures necessary to ensure that the detention conditions are generally compatible with the applicable international standards, particularly concerning sanitation, and that access to medical treatment is guaranteed to the extent prescribed by the respective specialists or physicians.

39. The Commission highlights that, in conformity with Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute a prejudgment on the possible violation of rights safeguarded in the American Declaration and other applicable instruments.

40. The Commission instructs its Executive Secretariat to notify the present resolution to the United States and the applicants.

41. Approved on July 27, 2020 by: Joel Hernández García, President; Antonia Urrejola Noguera, First Vice-President; Flávia Piovesan, Second Vice-President; Esmeralda Arosemena de Troitiño; Stuardo Ralón and Julissa Mantilla, Commissioners.

Paulo Abrão
Executive Secretary

EXHIBIT B

LA RESISTENCIA



Executive Secretary
Tania Reneaum Panszi

Rapporteur for the United States: Commissioner Roberta Clarke

Rapporteur for People Deprived of Liberty Edgar Stuardo Ralón Orellana

Special Rapporteur on Economic, Social and Cultural Rights (REDESCA) Javier Palummo Lantes

Special Rapporteur for Freedom of Expression (RELE) Pedro José Vaca Villareal

Fernanda Alves dos Anjos. Coordinator: Precautionary Measures Unit

Inter-American Commission on Human Rights

March 19th, 2024

Re: Detained Migrants at Northwest Processing Center
PM 265-20

Dear Rapporteur:

Alejandra Gonza, Executive Director of Global Rights Advocacy (“GRA”), Thomas Antkowiak, Director of the International Human Rights Clinic at Seattle University School of Law (“the Clinic”), and Maru Mora Villalpando, leader of La Resistencia, write to you to: submit updated information on the human rights situation at the Northwest Processing Center (NWIPC or NWDC), requesting your urgent action to avoid irreparable harm of immigrants currently detained or transferred in retaliation for providing information to La Resistencia for this submission. We respectfully request that the Inter-American Commission of Human Rights requests direct your inquiries and recommendations to all branches of the Federal Government and the State of Washington of the United States of America, as well as remind the United States of America the duty to oversee GEO the corporation operating detention center, demanding to adopt all necessary measures of protection for migrants in detention in light of the recent deaths under custody, reports on attempted suicides, sharp deterioration on detention conditions, without effective responses to grievances and lack of due oversight.

We ask you to also recognize and publicly express your concern due to the breadth and depth of rights abuses that are endemic to the system of immigrant detention; and that in recognition of international law’s prohibition on civil immigration detention, you call for an end to immigrant detention and an end to the profiteering of private prison corporations in the detention of immigrants.

In the past two weeks alone we have witnessed a **death of one immigrant in detention after almost 4 years in solitary confinement**, at least five attempted suicides, several instances of fire trucks and ambulances attending emergencies, a dangerous fire inside the facility without safety response for immigrants detained, the rejection by GEO of state inspections arguing discrimination, someone testing positive for lung fungi, hunger strikes inside and outside the center, retaliation for protesting including unjust transfers to other detention centers, to name just a few. Furthermore, since we requested clearance for our team members to visit the detention center and recover direct testimonies from hunger strikers over a month ago, we were not granted access, despite repeated requests, until today, and inexplicably only for 30 days. We will describe in the brief different situations that are grave and provoke and imminent danger of irreparable harm.

First, the current situation follows a year of constant complaints, including violent and armed repression of hunger strikes or other protests with chemical agents in different units, and the reluctance of responding properly to Freedom of Information Act requests. Considering the information, we are submitting, we inform you that the following immigrants have provided oral consent to La Resistencia to request the Inter-American Commission to use their names in your communication to the US Government, and ask that you include their or any public report or press release you consider publishing, we ask for:

1. An independent **investigation of deaths in custody at the NWIPC** and investigation of the cases of medical neglect, and the deportation of people gravely ill to their death. This includes:
 - a. [REDACTED] (died in custody)
 - b. [REDACTED] (died in custody)
 - c. [REDACTED] (died immediately after deportation)
2. The immediate release of all detained immigrants **in prolonged detention**, including all those **in solitary confinement and on hunger strikes**, including:
 - a. [REDACTED], Pakistan
 - b. [REDACTED] Micronesia)
 - c. [REDACTED] (Mongolia)
 - d. [REDACTED] (El Salvador)
 - e. [REDACTED]
3. The immediate release of those detained migrants that are currently sick, including.
 - a. [REDACTED]
 - b. [REDACTED]
 - c. [REDACTED]
 - d. [REDACTED]
 - e. [REDACTED]
 - f. [REDACTED]
4. The immediate release of all those who requested bond, including:
 - a. [REDACTED]
 - b. [REDACTED]
 - c. [REDACTED]
 - d. [REDACTED]
5. The immediate release of transgender women placed in men's facilities, and all those who were sexually assaulted, including.
 - a. [REDACTED] (transgender)
 - b. [REDACTED] (sexually assaulted)
6. The immediate release of all hunger strikers and witnesses providing information:
 - a. [REDACTED]
 - b. [REDACTED]
 - c. [REDACTED]

- d. [REDACTED]
- e. [REDACTED]

Second, the urgency of the situation is demonstrated by **the history of lack of due diligence and accountability from the GEO Group**, the corporation running the Northwest Ice Processing Center (NWIPC or NWDC). The corporation was originally established as the Wackenhut Corrections Corporation in 1983, GEO Group facilities include prisons, immigration detention centres, minimum-security detention centres, and mental health and residential treatment facilities totaling 102 facilities. GEO Group is headquartered in the United States and manages facilities in North America, Australia, South Africa, and the United Kingdom¹. Although according to GEO Group they conducted in 2021 a human rights impact assessment of its operations² as part of its Global Human Rights Policy, they failed to identify any salient human rights that represent potential risks based on the nature of GEO's business services³. They failed to acknowledge in that assessment the international complaints and recommendations they received, including these precautionary measures, as well as the different lawsuits arguing human rights violations. Given the well-known and protracted nature of the human rights violations at GEO Group's facilities, banks and other financial institutions were asked to stop financing GEO Group and divest of holdings in the company that they own or manage, including nominee shareholdings and shares invested in index funds⁴. As stated in the facts section every attempt to open the center for more regulation and oversight is stopped by aggressive litigation by GEO and lack of action by the US government, and not by a mitigation and remediation response.

Third, a follow-up by the Inter-American Commission is also necessary considering the demonstrated vulnerability of hunger strikers, the retaliation they suffer, and the use of violence, solitary confinement, and transfers as punishment for protesting. Releasing immigrants should not be burdensome for the United States. The exceptional and supposedly non-punitive nature of civil detention, along with international recommendations to provide alternatives to detention for civil infractions are now more than ever in need of implementation. No one at the NWIPC is serving a criminal sentence; rather, they are awaiting an administrative decision on their immigration status.

Since our last written update and the United States failure to engage with petitioners and respond to multiple letters for more information, including sensitive information of people in danger of deportation to death, beneficiaries struggled to access acceptable detention conditions.

In the last two years, the United States has failed to protect the rights to life, personal integrity and health of the migrants who are detained at the NWDC, a private for-profit prison, and elsewhere in one of the over 147 migrant prison centers currently in operation in the United States. This failure has put immigrant beneficiaries of the precautionary measures in continued risk and for many resulted in serious, but preventable harm. Furthermore, instead of reinforcing protections for immigrants in detention according to international recommendations, all avenues for releases have been severely curtailed, and detention conditions worsened. Aside from losing in courts the right to bond hearings, the NWDC has been acting as if it is above the law. The IACtHR recommendations are blatantly ignored by GEO, ICE, and the United States government.

Finally, we are recurring to the IACtHR despite the **lack of serious engagement with the Inter-American Commission and petitioners**. The United States government is not engaging with the Inter-American Commission seriously. During working meetings, despite "commitment to advancing human rights" the US government has failed to engage at all in the implementation of the precautionary measures regarding the NWDC.

¹ Backtrack: Dodgy Deal GEO Group: Why this profile? https://www.banktrack.org/company/geo_group

² [GEO Human Rights Due Diligence](#) Assessment, 2021.

³ [GEO Human Rights Due Diligence](#) Assessment, 2021.

⁴ [BankTrack – GEO Group](#) Dodgy Deal GEO Group: Why this profile?

Petitioners have requested meetings with the US government to plan to work on concrete measures that will facilitate implementation considerably, but the State has denied petitioners requests.

1. FACTS UPDATES

a. **Special procedures and other human rights bodies have already expressed serious concerns about immigrant detention conditions at the Northwest ICE Processing Center (NWIPC): no proper response.**

Violations of federal law and human rights abuses at ICE detention facilities, including NWIPC, are nothing new. For years national oversight authorities and international human rights bodies have documented and reported on abuses such as arbitrary detention, abuse of solitary confinement, inhumane treatment and lack of effective remedies and accountability mechanisms at ICE jails. The abuses and mistreatment of detainees are not isolated events or accidental occurrences. Sadly, they are systematic and pervasive of the entire US immigration detention system.⁵ The United States immigration detention system has been repeatedly scrutinized for criminalizing immigrants and for not respecting or protecting the human rights of immigrants. International human rights monitoring bodies, including the Inter-American Commission on Human Rights (IACHR) and the United Nations Working Group on Arbitrary Detention (UNWGAD) extensively challenged the legal framework and practices that allow for mass incarceration of immigrants in the US⁶, and their unacceptable detention conditions at immigration detention centers⁷, including the Northwest ICE Processing Center.⁸ These bodies recommended the United States move toward a humane immigration model that avoids detention, specifically calling for the United States to end mandatory immigration detention and allow for alternative forms of custody, such as “the case-management- based release of individuals into the custody of family members or other

⁵ Government Accountability Project. Complaint presented to the House Committee on Homeland Security and others detailing civil and human rights violations at Richwood Correctional Center. July 10, 2020; Project South. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at Irwin County Detention Center. September 2020; Robert F. Kennedy Center Human Rights and other organizations. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at the Pine Prairie ICE Processing Center. June 2021; Earth Justice and other organizations. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at Imperial Regional Detention Facility. January 25, 2022, and National Immigration Justice Center. Complaint presented to the Office of Civil Rights and Civil Liberties, the Office of the Inspector General and the Office of the Immigration Detention Ombudsman detailing civil and human rights violations at ICE detention centers. June 2, 2022.

⁶ Human Rights Council, Report of the Working Group on the Universal Periodic Review- United States of America (Third Cycle), A/HRC/46/15 (Dec. 15, 2020); United Nations, Report of the Working Group on Arbitrary Detention on its visit to the United States of America, A/HRC/36/37/Add.2 (July 17, 2017); United Nations Committee against Torture, Concluding observations on the combined third to fifth periodic reports of the United States of America, CAT/C/USA/CO/3-5 (Dec. 19, 2014); United Nations Human Rights Committee, Concluding observations on the fourth periodic report of the United States of America, CCPR/C/USA/CO/4 (April 23, 2014); Human Right Council, Report of the Working Group on the Universal Periodic Review- United States of America (First Cycle), UN Doc. A/HRC/16/11 (Jan. 4, 2011); ; Inter-American Commission on Human Rights, Report on immigration in the United States: Detention and Due Process, OEA/Ser.L/V/II. 78/10 (Dec. 10, 2010); IACHR, Human Rights Situation of Refugee and Migrant Families and Unaccompanied Children in the United States of America, OAS/Ser.L/V/II. 155 (July 24, 2015); Inter-American Commission on Human Rights, IACHR Expresses Concern over Executive Orders on Immigration and Refugees in the United States (February 2017).

⁷ United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on Arbitrary Detention; the Working Group on the issue of human rights and transnational corporations and other business enterprises, and others: Communication of January 2021, concerning detention conditions at the Irwin County Detention Center (ICDC), Reference: UA USA 34/2020.

⁸ United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others: Communication of April 20, 2020 concerning the lack of necessary protection measures in light of COVID-19 pandemic for migrants in detention at NWPC, Reference: UA USA 7/2020; and Mandates of the Working Group on Arbitrary Detention; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others: Communication of February 8, 2018 concerning the initiation of deportation proceedings against Ms. Maru Mora Villalpando, allegedly in retaliation for her domestic and international activism as a human rights defender and alleged human rights abuses by the GEO group, Reference: UA USA 2/2018; IACHR, Precautionary measure No. 265-20, Northwest Detention Center regarding the United States of America, Resolution 41/2020 (July 27, 2020).

community sponsors, non-monetary parole and release on recognizance.”⁹ Human rights bodies found many immigration policies in the United States arbitrary and unlawful.¹⁰

In particular, regarding the NWIPC in February 2018 several mandate holders of the Special Procedures to the United Nations Human Rights Council issued an urgent appeal expressing specific concerns on “substandard conditions” and “no independent oversight carried out over the running of this center.”¹¹ The experts expressed concern over the fact that “the detention of immigrants appears to be influenced by economic incentives”. In April 2020, the experts issued a second urgent appeal requesting the United States to release immigrants held for processing, raising concerns about the failure to adequately address previous recommendations and sending also a communication to GEO.¹² The Special Procedures also highlighted preoccupation regarding allegations of substandard health and hygienic conditions at the NWIPC, which worsened in light of the pandemic. Additionally, they urged the United States to **resort to non-custodial community-based alternatives to immigration detention**. Furthermore, in the Case of Fernando Aguirre Urbina, a Mexican immigrant who spent seven years at the NWIPC the UNWGAD found his detention to be arbitrary stating it violated the principle of proportionality.¹³ The Government had stated he posed a danger to the community and was considered a flight risk without offering any evidence to substantiate such claims.¹⁴ The UNWGAD found that there were no alternatives to detention considered for Mr. Aguirre-Urbina,¹⁵ and that individual consideration for the reasonableness of his detention was not sufficiently provided. The UNWGAD found that his detention was discriminatory.¹⁶ Indeed, Mr. Aguirre-Urbina, not only is mentally disabled due to his mental illness but further identifies himself as bisexual;¹⁷ and none of these factors were initially considered during the proceedings against him.¹⁸ The UNWGAD observed with concern that Mr. Aguirre-Urbina was not appointed counsel for his proceedings until more than two years after he was found incompetent and six years after the government requested protection.¹⁹

You also have challenged the legal framework and practices that allow for mass incarceration of immigrants in the United States and raised concerns about the inhumane detention conditions that immigrants endure when in custody.²⁰ In August 2019, the IACRH conducted a visit to observe the situation of human rights

⁹ United Nations, Report of the Working Group on Arbitrary Detention on its visit to the United States of America, A/HRC/36/37/Add.2 (July 17, 2017), para. 30.

¹⁰ For example, in 2018, the former UN High Commissioner for Human Rights called US border policy of separating migrant children from parents “a cruel practice of government-sanctioned child abuse” (June 18, 2018). See also: OAS. Permanent Council, Resolution 1106 on the Impact on the human rights of migrants of the policy of the government of the United States of America of Separating Migrant Families. OEA/Ser.G CP/RES. 1106 (2168/18) rev. 1.

¹¹ United Nations, Mandates of the Working Group on Arbitrary Detention; the Working Group on the issue of human rights and transnational corporations and other business enterprises; the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the human rights of migrants: Communication of February 8, 2018 concerning the initiation of deportation proceedings against Ms. Maru Mora Villalpando, allegedly in retaliation for her domestic and international activism as a human rights defender and alleged human rights abuses by the GEO group, Reference: UA USA 2/2018

¹² United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others, Communication of April 20, 2020 concerning the lack of necessary protection measures in light of COVID-19 pandemic for migrants in detention at NWPC, Reference: UA USA 7/2020.

¹³ United Nations, Opinion of the Working Group on Arbitrary Detention Fernando Aguirre Urbina v. United States, A/HRC/WGAD/2020/49, para. 4 (Sept. 22, 2020), at para. 46.

¹⁴ *Id.*, at para. 22.

¹⁵ *Id.*, at para. 22.

¹⁶ *Id.*, at para. 74.

¹⁷ *Id.*, at para. 74.

¹⁸ *Id.*, at para. 74.

¹⁹ *Id.*, at para. 73.

²⁰ IACRH, Report on immigration in the United States: Detention and Due Process, OEA/Ser.L/V/II. 78/10 (Dec. 10, 2010). See also, IACRH, PM 505/18, Vilma Aracely López Juc de Coc and others regarding the United States of America, August 16, 2018; IACRH, PM

at the Southern border. It expressed its concern about the “dramatic increase in the use of migrant detention, immediately and, in some cases, for long periods”, and its effect of separating families and discouraging the pursuit of ongoing asylum proceedings”, as well as the existence of barriers to access to legal assistance and support for migrants.²¹ Since July 27th, 2020, your precautionary measures requested that the United States safeguard the rights to life, personal integrity, and health of all migrants held at the NWIPC, in particular by ensuring that they have a **speedy and accessible access to the appropriate remedies to assess the continuity of their detention** and to ensure that detention conditions at NWIPC comply with the applicable international standards.²² In 2021 you called on states to use other methods than detention to address migration²³. Despite that your precautionary measures triggered two working meetings with the US Government, nothing triggered any actions to implement your recommendations.

In November 2023 the Human Rights Committee reviewed the United States and “expressed concerns regarding immigrants’ mandatory and prolonged detentions in which they are not given access to legal counsel. The Committee found that facilities are overcrowded, do not provide access for basic needs, and lead to instances of violence and even death and efforts should be made to ensure that detainees are held for the shortest time possible and that the detention facility conditions conform to international standards, including the prevention of abuse, violence, and death. Victims should be provided with access to full reparations, assistance, and protection²⁴.

b. Hunger strikes as the last resource to access dignity.

It is well documented that immigrants are not protected by law and courts. Throughout 2023 and the first 3 months of 2024 immigrants in custody at the Northwest Detention Center organized and participated in several hunger strikes in attempts to push forward a variety of changes to the detention center. In 2023 we documented at least seven different hunger strikes.

The first strike began on the first of February 2023 with a reported 115 detainees joining the strike. Their demands included specifically freedom, humane treatment, an end to excessive punishment, improved medical and dental treatment, a return of minimum wage jobs, more nutritious and varied food options, access to

731/18, Migrant Children affected by the “Zero Tolerance” Policy regarding the United States of America, August 16, 2018. Also, IACtHR, Press Release No. 130/18, IACtHR Expresses Concern over Recent Migration and Asylum Policies and Measures in the United States, June 18, 2018; IACtHR Expresses Concern over Recent Migration and Asylum Policies and Measures in the United States, June 18, 2018.

²¹ IACtHR, “IACtHR conducted visit to the United States Southern Border,” September 2019, available at:

https://www.oas.org/en/iachr/media_center/PReleases/2019/228.asp. During the visit the IACtHR also observed how the right to asylum and international protection procedures were being implemented in the US; conditions of detention for migrants and the practices associated with such detention; migration and asylum procedures; and due process guarantees and judicial protection. The IACtHR expressed its concern about the “dramatic increase in the use of migrant detention, [...] and of migration to the United States more generally, and the implementation of fast-track deportations through procedures without due process guarantees.” It also manifested preoccupation about the existence of barriers to access to legal assistance and support for migrants and asylum-seekers at their credible fear interviews, court hearings, and administrative and judicial proceedings concerning their migrant status and the impact of judicial independence in the immigration court structure.”

²² IACtHR, PM No. 265-20, Northwest Detention Center regarding the United States of America, Resolution 41/2020 (July 27, 2020). In this resolution, the IACtHR stressed that the principle of exceptionality in immigration detention calls for the establishment of a presumption of liberty, the contrary being incompatible with the object and purpose of Articles I and XXV of the American Declaration. It further emphasized that detention is only permissible when a case-specific evaluation considers that the measure is essential to serve a legitimate interest of the State.

²³ [IACtHR Calls on States in the Americas to Adopt Migration and Border Management Policies That Incorporate a Human Rights Approach](#)

²⁴ U.N. Hum. Rts. Comm., Concluding Observations on the Fifth Periodic Report of the United States of America, ¶¶ 6-7, U.N. Doc. CCPR/C/USA/CO/5 (Nov. 3, 2023) [hereinafter Concluding Observations Fifth Periodic Report]. SUMMARY RECORD OF THE HUMAN RIGHTS COMMITTEE’S 5TH PERIODIC REVIEW OF UNITED STATES REPORT ON COMPLIANCE WITH THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHT, Sarah A. Dávila et al.

recreational opportunities such as arts and crafts, and lower commissary prices.²⁵ In response to the strike and the escalating tensions over the demands from immigrants detained, GEO Group guards ran **an inspection of one of the units in the facility**.²⁶ Immigrants indicate that the guards confiscated empty soda bottles that were being used as water bottles, but GEO Group and ICE claim that they confiscated razor blades. The immigrants, frustrated by the inspection, barricaded the door when the guards left. The guards returned, and when the immigrants would not open the door, GEO Group guards dressed as SWAT team in riot gear, released multiple containers of chemical gas into the unit through a slot in the door.²⁷ [REDACTED] testified that his unit was also gassed with chemical agents for three hours to subdue the unit below him, even though he did not protest. [REDACTED] slept and woke up the moment he sensed gas all over him, which caused him to cough non-stop. He collapsed and was taken to urgent care for lung treatment²⁸. Afterwards, he depended on an inhaler, even though he never needed one prior to staying at NWIPC. The immigrants in the unit were later led out of the unit, choking and in clear distress from the chemicals (see below incidents with use of chemical agents). In a later hunger strike in mid-June of 2023²⁹, immigrants detained again demanded improvement to the food in the detention center. They specified that they needed better vegetarian options and demanded meat choices other than soy or bologna. Other demands included lower commissary prices, access to the law library, more frequent ICE visitations so they could get more regular updates about their cases, better cleaning in dorms and bathrooms, and more accountability for grievances that are filed internally. ICE initially agreed to many of the demands of the strikers highlighting specific changes to the menu, increased cleaning schedules and the return of contact visits.³⁰ However, immigrants detained say that though there were some minor changes in the weeks after ICE's agreement to the demands, conditions quickly reverted to the pre-strike status quo. In July, another hunger strike occurred, this time demanding immediate release after prolonged detention and highlighting the extremely low bond approval rates.³¹ The Northwest Detention Center **has the lowest bond grant rate in the country** at 3% of bond requests being approved, and when granted they are disproportionate³². The strike was an attempt to push immigration judges to approve bonds more frequently to allow detainees facing deportation to be reunited with their families.

From September seventh to tenth, 2023 seven women were involved in a strike that began when ICE refused to let a detainee named [REDACTED] out of incarceration to attend her son's funeral.³³ Her son had been in a fatal car accident and Ms. [REDACTED] had been given a direct guarantee from ICE that she would be able to attend the funeral. ICE then ignored all complaints and Ms. [REDACTED] was not granted release. In early November, an immigrant from Mongolia named [REDACTED] went on hunger strike after an

²⁵ Lilly Ana Fowler on X: ".@ResistenciaNW says the latest hunger strike at the NW Detention Center in Tacoma has ended because ICE has promised to improve conditions. During the strike, detainees there were gassed because of ICE. Here's a list of demands from those detained: <https://t.co/Wa7hF9pMII>" / X (twitter.com)

26 Northwest ICE center uses 'chemical agents' on immigrant detainees | The Seattle Times

27 85+ People at Washington State Migrant Prison Go on Hunger Strike | Democracy Now!

²⁸ Testimony provided to Global Rights Advocacy in February 2024, after his release.

²⁹ Detainees at Northwest Detention Center launch a hunger strike — Fight Back! News (fightbacknews.org)

30 LaResistencia NW on X: "1- They will change the menu of soy and bologna 2- They are going to hire professional food handlers 3- They are going to hire a company to clean, not only once a day but twice a day 4- Contact visits will return with ICE approval" / X (twitter.com) (1) LaResistencia NW on X: "1- They will change the menu of soy and bologna 2- They are going to hire professional food handlers 3- They are going to hire a company to clean, not only once a day but twice a day 4- Contact visits will return with ICE approval" / X (twitter.com)

³¹ [LaResistencia NW on X](#): "5th #hungerstrike in 2023- 7 people demanding their release, requesting a bond. @icegov @GEOGroup infamous facility is well known for inhumane detention conditions. Now also infamous for having the lowest bond rate given in the country- 3%! Take action! #freethemall #noretaliation <https://t.co/G3YIuLGM9s>" / X (twitter.com)

³² United Nations, Opinion of the Working Group on Arbitrary Detention, Fernando Aguirre Urbina vs. the United States A/HRC/WGAD/2020/49, his bond was 30 000 (Sept. 22, 2020).

³³ [Lilly Ana Fowler on X](#): "@ResistenciaNW says there's another hunger strike at the ICE detention center in Tacoma. They say it's due to ICE refusing to allow a detained mother attend her son's funeral. Have reached out to ICE for comment. <https://t.co/0W0dYJMGL3>" / X (twitter.com)

immigration judge denied bond after conflicting information from his ICE officer.³⁴ His strike lasted nine days before he had to end his protest over health concerns. After a long fight to be heard, [REDACTED] was granted a disproportionate bond of USD 15,000. On November eleventh, the longest strike of the year began and quickly gathered support, involving 105 people.³⁵ The demands included immediate release or immediate deportation for those who had signed final deportation orders.³⁶ This strike lasted throughout the rest of 2023, coming to an end on January 2, 2024, after 53 days when ICE conceded to the demands of the strikers. There are several immigrants currently demanding bonds to protect their lives and health³⁷: [REDACTED], [REDACTED], [REDACTED].

Another strike quickly started on **January 4, 2024**, with 100 detainees demanding that ICE start following proper interview processes and inhumanely long processing times.³⁸ The strike ended sometime between the 9th and the 14th when GEO guards sent strikers to separate cells in an attempt to break up the strikers and end the strike.³⁹ Throughout the strike, strikers reported that both the water and heating were turned off.⁴⁰ The second hunger strike of 2024 **began on February 2**, was paused after ICE agreed to listen to their demands, but was restarted two days later when they were threatened with inaction while the strike was ongoing.⁴¹ The detainees were demanding freedom or deportation as they had been in a state of limbo for months.⁴² **On February 7**, strikers reported intimidation efforts by ICE officers who told the strikers that if they continued, their cases would be intentionally left unreviewed.⁴³ Reportedly, Mexican hunger strikers were specifically targeted for this intimidation efforts by ICE supervisors.⁴⁴ The strike ended on the 12th of February after reporting ICE retaliation and intimidation efforts including tampering with telephone access to make it impossible to report on the events going on inside the facility.⁴⁵

In Response to the ongoing situation of the death described below in the next section, Unit B3 and Unit A3 began the third large scale hunger strike consisting of over 40 people. They have gone on hunger strike and have been on hunger strike consistently since March 9th, 2024. As of **March 13th, over 400 individuals** have been reported by La Resistencia to currently be on Hunger Strike following the death of Charles Leo Daniel and the subsequent suicide attempts in the days following his death.⁴⁶ Members of La Resistencia are protesting outside the Detention Center and several members joined the hunger strike in solidarity with immigrants inside.

[REDACTED], the immigrant that first reported to La Resistencia the death of Mr. Daniels was transferred to Texas in retaliation. During the encampment they received harassment from GEO employees, and several white trucks are passing by back and forth to surveille the peaceful protest.

³⁴ [Immigrant detainees' resort to hunger strikes in protest of conditions at Tacoma facility | The Spokesman-Review](#)

³⁵ [LaResistencia NW on X: "!!Hunger strike update!! D2 unit just joined so now there is a total of 105 people on strike, 80 more people demanding answers to their individual cases. They wont stop until they get answers from ICE. #abolishice #abolishgeogroup #chingalamiga #shutdownnwdc @DerekKilmer https://t.co/KRSr4jUk7Y" / X \(twitter.com\)](#)

³⁶ [LaResistencia NW on X: "!! Emergency rally today at 2pm #hungerstrike started this morning at NWDC demanding immediate release @icegov @geo.group #shutdownnwdc #freethemall #abolishice https://t.co/Y8BPuD0jhx" / X \(twitter.com\)](#)

³⁷ See Exhibits: Testimonies gathered by La Resistencia and Global Rights Advocacy

³⁸ La Resistencia Instagram Post on January 7, 2024.

³⁹ La Resistencia Instagram Post on January 14, 2024.

⁴⁰ La Resistencia Instagram Post on January 12, 2024, and January 13, 2024.

⁴¹ [Over 100 detainees at the NW Detention Center end second hunger strike there this year - The Columbian](#)

⁴² La Resistencia Instagram Post on February 5, 2024.

⁴³ La Resistencia Instagram Post on February 7, 2024.

⁴⁴ La Resistencia Instagram Post on February 17, 2024.

⁴⁵ La Resistencia Instagram Post on February 12, 2024; and La Resistencia Instagram Post on February 17, 2024.

⁴⁶ La Resistencia Instagram Post on March 14, 2024, and La Resistencia Instagram post on March 9, 2024.

<https://www.instagram.com/p/C4UrwKEuwBz/>

2. Tortured to death: the practice of medical neglect and solitary confinement in connection with deaths and suicide attempts.

a. History of deaths under custody and deportation

The United States does not meet its duty of care to detained immigrants in its custody and have failed to release information regarding deaths occurred in detention centers⁴⁷. Previously the United States was unable to prevent the deaths of migrants in ICE custody due to human rights violations. United Nations Special Procedures sent to the US communications in that regard.⁴⁸ People with medical conditions are constantly reported to have difficulties accessing medical records, being scared to complain about health care and fear they will affect their immigration cases. They know about retaliation, transfers, and express deportation. Specifically, at the NWDC there are precedents: ██████████ died while in isolation at the end of 2018, a Russian asylum seeker. His handwritten message⁴⁹ casted doubt on ICE's official explanation of suicide. ██████████ notes wrote:

“They found a rope in my cell. Officers thought I wanted to hang myself. Then they took me to another section — for those who are suicidal — and locked me up there alone, having taken away all my clothes. They gave me a mattress, cover sheet and a thin blanket. It was uncomfortable and cold. Two days later, after a session with a psychologist, they took me back to my regular cell.”

The results of the internal investigation conducted have not been made fully public and there is pending litigation with an order to Immigration and Customs Enforcement (ICE) to redo its search for records related to deaths of people in immigration custody and release them to the public⁵⁰. The requests for independent investigations are unanswered. But there are also troubling records of deporting people to death. For example, in the summer of 2019, ██████████ was deported to his death in Mexico, despite being on a waitlist for an organ transplant. He was demanding dignified medical care at Tacoma for a long time; he was shackled during dialysis three times a week, and then placed for hours after dialysis in holding cells that were filthy and unhygienic rather than being allowed to return to his pod and deprived of medications previously prescribed to him. He had to file numerous complaints to both GEO and ICE. Being forced to rely on the negligent NWDC medical staff for his healthcare left him in a constant state of stress and panic, impacting his already diagnosed high blood pressure⁵¹. He died in Mexico City, unable to access medical care after deportation, exactly as he said it would happen.

b. Pushing immigrants to death: solitary confinement and attempted suicides

According to international law, after 15 days, solitary confinement is torture⁵² and data reveals that of the ten individuals who served the longest periods of solitary confinement across the nation in immigration detention, five were held at Tacoma's NWIPC. Of these, two cases had “mental illness” flags, and one – corresponding to Charles Leo Daniel – had a “serious mental illness” flag. On March 7th, 2024, **Charles Leo Daniel, a 61-year-old Trinidadian citizen died in strange circumstances after being incarcerated for about four years in detention.**

⁴⁷ ICE loses each challenged exemption: [American Oversight ‘Will Get Those Documents’: ICE Must Redo Records Search and Release Requested Records Related to Deaths in Custody](#)

⁴⁸ See AL USA 18/2018; AL USA 7/2019; AL USA 25/2018

⁴⁹ Translation from Notre Dame University student 2018 of Professor Gonza human rights advocacy seminar. Iulia Emsteva from the Human Rights Advocacy Seminar.

⁵⁰ UW Center for Human Rights [report](#).

⁵¹ Interview by Global Rights Advocacy with ██████████ (April 20th, 2018).

⁵² [“Endless Nightmare”: Torture and Inhuman Treatment in Solitary Confinement in U.S. Immigration Detention - PHR](#) by Physicians for Human Rights (PHR), in collaboration with scholars at Harvard Law School and Harvard Medical School

He was held in solitary confinement for a total of 1244 days, divided among two stints.⁵³ According to a recent report by the UW Center for Human Rights, Charles Daniel served the second-longest stretch in solitary confinement of any person in ICE custody since 2018, despite being identified by ICE as having significant mental illness⁵⁴.

Authorities operating Northwest Detention Center in Tacoma, WA called emergency services to report the death. Reports from detained immigrants on the inside say that a man might have committed suicide while in the isolation unit. Reports from Tacoma police dispatch confirm that between 10:30 AM and 11:30 AM.⁵⁵ [REDACTED]

[REDACTED], an immigrant held for more than 2 years at the NWIPC, who spoke to the organization La Resistencia about the incident, says that an alarm sounded at around 10:45 AM, causing chaos in the facility.⁵⁶ “*There were all these people, running all over the place. The police came, as well as some firemen. I realized this Black guy was up there [in segregation], and he looked as if he had hung himself*”⁵⁷. He added that, “*they brought him out on this funeral bag, because the coroner came to pick him up.*” Furthermore, the incident took place in the segregation unit - a euphemistic term of “solitary confinement” - where at least thirteen more people were detained, per the witness.⁵⁸ Later that day, he said emergency services came to “check in” on the distraught detainees, saying that they were aware something “tragic” had taken place. Journalists confirmed with Tacoma police and they said that “a 61 year old male was found unresponsive in his cell this AM at the ICE detention center in Tacoma. Police have started a preliminary death investigation. No other details were immediately available.⁵⁹ ICE claimed that it notified the Embassy of the Republic of Trinidad and Tobago in Washington D.C., as well as the Department of Homeland Security, Office of Inspector General, and the ICE Office of Professional Responsibility that Charles Leo Daniel’s died, even though ICE did not clearly state that his relatives were notified about his death.⁶⁰

GEO Group’s facility in Tacoma is known for its excessive and longer use of solitary confinement in the country⁶¹. The NWIPC averaged solitary confinement stays of almost 59 days compared to the national average of 27 days. This prolonged institutional use of solitary confinement constitutes torture⁶². [REDACTED] also added that he had been placed in solitary confinement as punishment for talking to La Resistencia, with GEO Group Warden - Bruce Scott - going as far as accusing him of terrorism and hinting at the fact that he would be in solitary confinement for a while. He was suddenly transferred to Texas as retaliation, and we ask the IACR to provide immediate protection for him.

The recent death is a disturbing episode for all those detained and is causing severe anxiety and fear of dying. After Mr. Daniels died, at least five suicide attempts were reported by immigrants calling La Resistencia or by the tracking of information responses from the police or fire department⁶³. On March 11th at 3:43 A.M, Tacoma Fire dispatch was called to the Northwest Processing Center for a suicide attempt⁶⁴ and on the same day at 6:29 P.M

⁵³ “Trinidad and Tobago National in Ice Custody Dies at NWIPC.” ICE, www.ice.gov/news/releases/trinidad-and-tobago-national-ice-custody-dies-nwipc

⁵⁴ UW NWDC Conditions Research Update: Charles Leo Daniel’s Death at NWDC in Context - Center for Human Rights

⁵⁵ Talbot, Peter. *Ice Identifies Detainee Found Dead in Tacoma Detention Center* | ..., 12 Mar. 2024, www.thenewstribune.com/news/local/article286561665.html

⁵⁶ Goodman, Amy, and Juan González. “Immigrants Held in For-Profit Ice Jail Report Death, Suicide Attempts amid Crackdown.” *Democracy Now!*, 12 Mar. 2024 www.democracynow.org/2024/3/12/maru_mora_villalpando_northwest_detention_center

⁵⁷ Idem

⁵⁸ Talbot, Peter. *Man Found Dead in Cell at Tacoma Immigration Detention Center* | ..., 11 Mar. 2024, www.thenewstribune.com/news/local/article286438165.html

⁵⁹ Idem

⁶⁰ Idem

⁶¹ UW Conditions at the NWDC: Solitary Confinement - Center for Human Rights

⁶² Standard Minimum Rules for the Treatment of Prisoners Adopted by the First United Nations Congress on the Prevention of Crime

⁶³ La Resistencia Post 3-15-2024 <https://www.instagram.com/p/C4g1X7QPtEV/>

⁶⁴ Tacoma Fire Dispatch Transcript: Tacoma Fire Dispatch 13:59:49 AM 3/11 8-4, Channel A-2, BLS, Injury, 1-5 Northwest Detention Center, 1623, East K Street. 8-4, Channel A-2, BLS, Injury, 1-5 Northwest Detention Center, 1623, East K Street. Time 3, 59. Tacoma

another ambulance was dispatch in response to a “possible suicide attempt via hanging”⁶⁵. On March 13th, 2024, three serious attempted suicide happened between A3 and A2 and detainees witness all these incidents. A3 is still on hunger strike since Monday. One of the incidents with more information happened on March 13th at 11:30pm to 12am⁶⁶.

According to La Resistencia⁶⁷ and further documented in a Democracy Now Publication⁶⁸, an immigrant detained explained that “*in my unit A3 just try to commit suicide by hanging and through the rail upstairs but unfortunately, he fell off from the top tier almost 10 feet to the floor*”⁶⁹. *He was unresponsive for almost 40 minutes before the ambulance came and took him out. We don't know how his situation is right now. The medical staff came but couldn't do anything because they claimed that they don't have professionals to help the detainee till the ambulance came. This is getting serious; detainees are crying when the incident happened. They thought he was dead. If nothing is done soon, people will be taking their life one after the other*⁷⁰

On March 11th at 3:43 A.M, Tacoma Fire dispatch was called to the Northwest Processing Center for a suicide attempt⁷² and on the same day at 6:29 P.M another ambulance was dispatch in response to a “possible suicide attempt via hanging”⁷³. On March 13th, 2024, three serious attempted suicide happened between A3 and A2 and detainees witness all these incidents. A3 is still on hunger strike since Monday. One of the incidents with more information happened on March 13th at 11:30pm to 12am⁷⁴. Several calls to La Resistencia are showing that immigrants are facing dire conditions, and many manifested that the only escape is dying.

2. Solitary confinement is torture and is killing immigrants.

Solitary confinement, also called “segregation” or “isolation” by ICE, generally refers to the confinement of an individual for 22 hours or more a day with no meaningful human contact.⁷⁵ Solitary confinement is a “form of segregation in which individuals are held in total or near-total isolation”.⁷⁶ International human rights and refugee law prohibits the prolonged and arbitrary use of solitary confinement in immigration detention. Article 25 of the American Declaration and 5.2 of the American Convention on Human Rights prohibits torture and cruel and inhuman or degrading treatment. The Special Rapporteur on Torture stated that solitary confinement, when used

Police North Dispatch 3:43:14 AM 3/11 Go ahead. We're getting a suicide attempt call. Fire's already been advised. I see a Northwest Detention Center. Do you want to dispatch on this as well? Yeah.

⁶⁵ Information north and north traffic responding to a possible suicide attempt via hanging at the detention center 1623 East Jadon Street.

⁶⁶ Engine 1, Channel A2, BLS, Fall, Ice Northwest Detention Center, 1623, East J Street. Engine 1, Channel A2, BLS, Fall, Ice Northwest Detention Center, 1623, East J Street. Time 23.35.

⁶⁷ La Resistencia Post 03-14-2024 https://www.instagram.com/p/C4fhPEer2Tm/?img_index=1

⁶⁸ [Immigrants Held in Private Northwest Detention Center Report Death, Suicide Attempts Amid Crackdown | Democracy Now!](#)

⁶⁹ Call to the Tacoma Fire Dispatch on 6:29 P.M “Information north and north traffic responding to a possible suicide attempt via hanging at the detention center 1623 East Jadon Street. Call 193- INFLATION-HELP”

⁷⁰ <https://x.com/democracynow/status/1767537931974070687?s=20>

⁷¹ See testimony from [REDACTED] in the exhibits.

⁷² Tacoma Fire Dispatch Transcript: Tacoma Fire Dispatch 13:59:49 AM 3/11 8-4, Channel A-2, BLS, Injury, 1-5 Northwest Detention Center, 1623, East K Street. 8-4, Channel A-2, BLS, Injury, 1-5 Northwest Detention Center, 1623, East K Street. Time 3, 59. Tacoma Police North Dispatch 3:43:14 AM 3/11 Go ahead. We're getting a suicide attempt call. Fire's already been advised. I see a Northwest Detention Center. Do you want to dispatch on this as well? Yeah.

⁷³ Information north and north traffic responding to a possible suicide attempt via hanging at the detention center 1623 East Jadon Street.

⁷⁴ Engine 1, Channel A2, BLS, Fall, Ice Northwest Detention Center, 1623, East J Street. Engine 1, Channel A2, BLS, Fall, Ice Northwest Detention Center, 1623, East J Street. Time 23.35.

⁷⁵ The United Nations Standard Minimum Rules for the Treatment of Prisoners ([Nelson Mandela Rules](#)), General Assembly resolution 70/175, annex, adopted on 17 December 2015, Rule 44.

⁷⁶ National Immigrant Justice Center & Physician for Human Rights, “Invisible in Isolation: The Use of Segregation and Solitary Confinement in Immigration Detention” (Sept. 2012), cited in Robert F. Kennedy Center Human Rights and other organizations. [Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at the Pine Prairie ICE Processing Center.](#), June 2021, pg.12.

for the purpose of punishment, cannot be justified for any reason as it imposes severe mental pain and suffering beyond any reasonable retribution for criminal behavior and thus constitutes an act defined in Article 1 or Article 16 of the Convention against Torture, and a breach of Article 7 of the ICCPR.⁷⁷ The Special Rapporteur on Torture then followed this comment by urging States to prohibit the imposition of solitary confinement as punishment, either as a judicially imposed sentence or a disciplinary measure.⁷⁸ The Nelson Mandela Rule 43 establishes that in no circumstances restrictions or disciplinary sanctions may amount to torture or other cruel, inhuman, or degrading treatment or punishment. Indefinite or prolonged solitary confinement is prohibited and could amount to those acts. Rule 44 identifies prolonged solitary confinement as solitary confinement for a time more than 15 consecutive days, therefore its use for such period could amount to cruel, inhumane, and degrading treatment or torture. Rule 45 also provides that solitary confinement shall be used only in exceptional cases as a last resort, for the least amount of time as possible and subject to independent review, and only pursuant to the authorization by a competent authority.⁷⁹ Rule 45 then continues to state that the use of solitary confinement on prisoners with mental or physical disabilities should be prohibited when their conditions would be exacerbated by such measures, and the prohibition of solitary confinement and similar measures continues to apply in cases involving women and children.⁸⁰

3. Lack of proper response to emergencies: a fire inside the facility

On the evening of March 15th, 2024, a fire was reported at the Northwest ICE Processing Center where the Tacoma Fire Department arrived to investigate its cause⁸¹. The fire, according to the Tacoma Fire Department, originated in an industrial clothes dryer located in the laundry room. Tacoma Fire Department spokesperson Joe Meinecke states that “Smoke traveled up and out a heating and air conditioning unit atop the building, which fire crews believed at first to be the source of the fire”. (See footnote 77). Testimony from Maru Mora, who was outside of the Northwest ICE Processing Center exclaimed that “*They did not Evacuate people, those who were in the yard were placed inside*”, “*The sprinkler system was activated and not all units heard alarms. Only those closest to the fire. The flames were seen coming out near the visiting area, but they said it was a dryer, but there are reports the HVAC ventilation system exploded. The flames came out of the ventilation system. It started in the laundry room, and when the alarms were heard, only the pods of those who were nearby heard the alarms. Only the women heard the alarm. They tried to blame us! Women calling us told us that inside officials said it was the demonstrators who started the fire outside and a spark jumped and caused the fire!*⁸²”. As maru explained, the response to the fire was not in line with ICE protocol and safety guidelines were ignored⁸³.

4. Chemical Agents as retaliation over Hunger Strikes in protest of Inadequate food and Unsanitary Conditions

In the past we have already reported to you **violent and armed repression of hunger strikes or other protests**. Multiple hunger strikes⁸⁴ occurred recently and armed violent response by GEO was documented and

⁷⁷ United Nations, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment, U.N. Doc. A/66/268, page 20, para. 72, available at [Annual thematic reports of the Special Rapporteur | OHCHR](#)

⁷⁸ *Id.* at para. 84.

⁷⁹ *Id.* Rule 45, para. 1.

⁸⁰ *Id.* Rule 45 para. 2: United Nations, Inter-Agency Standing Committee [IASC Interim Guidance on COVID-19: Focus on Persons Deprived of Their Liberty](#) March 27, 2020

⁸¹ [Fire reported at immigrant detention center in Tacoma — crews respond to scene](#)

⁸² See Exhibits: Testimonies gathered by La Resistencia and Global Rights Advocacy and Maru Mora Villalpando witness account given to Global Rights Advocacy on March 18, 2024.

⁸³ [1.2 Environmental Health and Safety](#)

⁸⁴ See testimonies from: [REDACTED], July 16th 2022 and May 16th, 2022; [REDACTED] (prior information and updated information to July 8th 2022); [REDACTED] July 8th: [REDACTED] (July 8th, 2022); [REDACTED] (June 29th 2022); [REDACTED] (May 16, 2022) *Some held at Tacoma ICE detention center fear COVID spread*, AP News, (May

including the gassing of immigrants trapped in different Units. On May 13, 2022, hunger strikers faced threats of transfers to other units and solitary confinement. The strikers also reported threats of being pepper-sprayed and force-fed.⁸⁵ Despite some negotiations and false promises to not send them to solitary, an ICE officer refused to provide written documents on their agreements and GEO sent a “SWAT team” (25 armed guards dressed in black riot gear, holding shields) drawing their big weapons onto strikers- removed those not striking from the unit. The strikers were handcuffed and sent to the G1 unit with individual cells and placed two strikers per cell. Several of the strikers were placed in solitary confinement, following ICE and GEO’s standard practice of intimidating and silencing dissent of those in detention. One of the leaders of the strike, [REDACTED], and three others were taken away from their units and placed in solitary confinement. [REDACTED] was then reportedly taken to the Center’s medical aisle to check his vital signs after not having eaten for days but was then placed in medical isolation in a dirty cell. He was kept there until the 19th of May on Thursday, when he agreed he would eat if he was sent back to the same unit he was before F3. Another striker was told that after 14 skipped meals ICE/GEO would get a court order to force them to eat. The rest of strikers who were moved to G1, complained that a guard was harassing another striker. Also, a third striker was harassed by 2 GEO guards while being booked into solitary. Those in G1 ended their strike sometime Tuesday, May 17th/Wednesday, May 18th because they wanted to go back to the general population. They were sent to another: unit G2, but not the unit where they wanted to go back to: F3. While in this unit, ICE officer Meyer along with a GEO guard went into the unit to talk about COVID vaccines. One of the strikers asked about getting a bond to which the ICE officer replied, “are you on strike?” The striker said yes, and the ICE officer said “if you are on strike, then no.” Even though, since the strike began, strikers reported that a couple of their demands were met - GEO delivered clean clothes, sent a crew to clean the unit, and food portions were bigger, and 10 ICE officers showed up to the unit to respond to questions about individual cases - these changes were only put in place in their unit and did not continue. **Second hunger strike:** On the evening of Friday May 20, once the strike in F3 was officially over, another hunger strike began in unit F4. The demands there were focused on stopping the spread of COVID-19, better detention conditions and lower commissary prices. Unit F4 had reportedly been placed in quarantine along with unit B3 while unit F3 was on a hunger strike. That same week, beneficiaries reported that 4 COVID cases were happening amongst GEO and ICE staff, including ICE medical staff. People in the F4 unit reported they had been placed in quarantine twice in less than a month. This last time they believed they were exposed to COVID by an employee working with the cleaning crew. In B3 unit 13 people tested positive for COVID and moved to F1, the remaining 12 that tested negative were moved to B1 unit with individual cells. Calls to and from La Resistencia to the Center had been blocked. Other family members' phone accounts were active. Multiple testimonies described the chaotic and disproportionate armed reaction, the big arms with rubber bullets being shot, and physical violence being exercised. The incompetent inspection supposedly made just one day before the hunger strike started by the Nakamote Group and ordered by ICE did not correctly document the complaints regarding detention conditions (see below lack of effective oversight).

The last incident on February 1st, 2023, GEO Group confirmed its use of “Chemical Agents” after U.S Immigration and Customs Enforcement (ICE) authorized “non-lethal” use of force at the **Northwest ICE Processing Center**⁸⁶. This follows a multitude of other reports that tear gas had been used at other immigrant detention facilities, where dozens of cases of the use of pepper spray within enclosed units was discussed at a

⁸⁵ 19, 2022), https://apnews.com/article/covid-health-hunger-strikes-immigration-washington-91bf62f695cc20a4fc5e7402e92261cd?fbclid=IwAR22KoOQ2eMBraLdLZaPmp2HrPZv-psy3TyuX_ZMDVozz9-zP-qd4rPjUUY

⁸⁵ See testimonies from hunger strikers in the exhibits: [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED].

Also see María Inés Taracena, *Detained immigrants in Washington face retaliation for hunger strike*, PRISM, (May 19, 2022), <https://prismreports.org/2022/05/19/detained-immigrants-washington-retaliation-hunger-strike/?fbclid=IwAR0wxMqrutak110hgMUGDnHAs4HiTXT9PeRFIrLZcOwM-44GyWhRYpf-h0> See also *Immigration Authorities Threaten Force Feeding on Hunger Strikers*, People’s Tribune, [https://www.peoplestribune.org/latest-news/immigration-authorities-threaten-force-feeding-on-hunger-strikers&fbclid=IwAR0oYAGfwZbS8PoaJsIAk95aZVYovVpPx3sP4S16HlwdOOxHyinebNr9HOw](https://www.peoplestribune.org/latest-news/immigration-authorities-threaten-force-feeding-on-hunger-strikers/?utm_source=rss&utm_medium=rss&utm_campaign=immigration-authorities-threaten-force-feeding-on-hunger-strikers&fbclid=IwAR0oYAGfwZbS8PoaJsIAk95aZVYovVpPx3sP4S16HlwdOOxHyinebNr9HOw)

⁸⁶ [Northwest ICE center uses ‘chemical agents’ on immigrant detainees | The Seattle Times](https://www.seattletimes.com/news/northwest/ice-center-uses-chemical-agents-on-immigrant-detainees/)

Homeland Security congressional hearing in mid 2020 after confirmation of the gassing instances by ICE.⁸⁷ [REDACTED], who was a witness to the chemical agent in the Northwest ICE Processing gas incident said “he could see and hear much of what happened. The confrontation began, he said, when guards inspected the unit, which [REDACTED] estimates holds roughly 30 people. The guards confiscated empty soda bottles detainees were using as water bottles, a use guards said was prohibited”. According to Audio records received from the ICE facility and from [REDACTED]’s account, “guards dressed in helmets and body armor arrived and unsuccessfully tried to talk with the detainees, then threw what he described as three grenades — one that gave off smoke and two that emitted something like tear gas. (GEO did not respond to a question about what kind of chemical agents were used.)”⁸⁸. The violent attack came after people detained were demonstrating and trying to stage a hunger strike against the daily inhumane conditions they face and the lack of response by ICE to their grievances.

To seek accountability for the atrocities done to the detainees in unit G4 in February of 2023, La Resistencia reached out to UW’s Center for Human Rights and asked them to file a public records request for video of the incident but did not hear back.⁸⁹ Northwest Immigrant Rights Project filed a request but did not hear back. Northwest Immigrant Rights Project then filed a complaint in federal court which resulted in partial video release.⁹⁰ The court filing requested 12 hours of video footage and ICE only released 100 minutes of the footage, yet they claim to not have anything to hide. The full release of footage has still not been obtained.⁹¹

5. Cruel deportation flights: resuming deportations through King County

In April of 2019, in response to numerous complaints regarding human rights abuses occurring on deportation flights, Dow Constantine, the King County Executive, issued an executive order that banned such flights out of King County.⁹² After that, all deportation flights for Washington State were occurring from Yakima.⁹³ ICE subcontracts with private airline charter companies, namely Swift Air, Western Atlantic Airlines, and GlobalX to carry out their deportation flights.⁹⁴ **But in February of 2020**, the United States Justice Department sued King County, seeking to overturn the ban, claiming that such a ban “obstruct[s] and burden[s]

⁸⁷ [Prison CEOs Say They Had No Clue Guards Pepper-Sprayed Hundreds of Immigration Detainees – Mother Jones](#)

⁸⁸ Testimony from [REDACTED] to La Resistencia.

⁸⁹ Deng, Grace. “Partial Video Released of Tacoma Immigration Site’s Use of ‘chemical Agents’ on Detainees • Washington State Standard.” *Washington State Standard*, 4 Feb. 2024, washingtonstatestandard.com/2024/02/02/partial-video-released-of-tacoma-immigration-sites-use-of-chemical-agents-on-detainees/?emci=528f6bcf-ebc3-ee11-b660-002248223197&emdi=61146ad7-3cc4-ee11-b660-002248223197&ceid=113272

⁹⁰ Deng, Grace. “Partial Video Released of Tacoma Immigration Site’s Use of ‘chemical Agents’ on Detainees • Washington State Standard.” *Washington State Standard*, 4 Feb. 2024, washingtonstatestandard.com/2024/02/02/partial-video-released-of-tacoma-immigration-sites-use-of-chemical-agents-on-detainees/?emci=528f6bcf-ebc3-ee11-b660-002248223197&emdi=61146ad7-3cc4-ee11-b660-002248223197&ceid=113272

⁹¹ Deng, Grace. “Partial Video Released of Tacoma Immigration Site’s Use of ‘chemical Agents’ on Detainees • Washington State Standard.” *Washington State Standard*, 4 Feb. 2024, washingtonstatestandard.com/2024/02/02/partial-video-released-of-tacoma-immigration-sites-use-of-chemical-agents-on-detainees/?emci=528f6bcf-ebc3-ee11-b660-002248223197&emdi=61146ad7-3cc4-ee11-b660-002248223197&ceid=113272

⁹² King County International Airport - Prohibition on Immigrant Deportations:
<https://kingcounty.gov/en/legacy/about/policies/executive/pfCEO/pfc71eo>

⁹³ <https://apnews.com/general-news-4d0b653f2ff37bd218d3004f76d26071>

⁹⁴ [Exporting COVID-19: ICE Air Conducted Deportation Flights to 11 LAC Countries, Flight Data Shows - Center for Economic and Policy Research; At Seattle’s Boeing Field, Real-Time Video Offers a Rare Glimpse of America’s Troubled Deportation Flights](#)

federal activities.”⁹⁵ In March of 2023, a federal court found that the ban “discriminates against the federal government because other users of the airport are not subject to the limitations found in the Executive Order.”⁹⁶ The court order to reopen King County International Airport (also known as Boeing Field) did not reckon with the central concern for the ban being put in place which was to prevent human rights abuses that were ongoing in such deportation flights. Alleged human rights abuses in relation to these flights include deportation without due process, in fact, several detainees who were deported were in the middle of pending legal cases in U.S. courts.⁹⁷ There were also reports of harassment, physical violence, and cruelty during the process of deportation including the use of a full-body restraint device known as “The Wrap” and disabled detainees being left without mobility assistance (in one specific case, a wheelchair user was not assisted into his seat on the flight and was forced to drag himself into the plane.)⁹⁸ There are also many examples of human rights abuses occurring on these ICE deportation flights outside of King County. In 2017, detainees on a deportation flight to Somalia said that they were shackled to their seats for 23 hours, were denied access to a restroom, and some were forced to soil themselves.⁹⁹

On Tuesday, May 2, 2023, the first deportation flight since the ban left Boeing Field.¹⁰⁰ The number of people who were on the flight is unknown.¹⁰¹ In response to the reopening of deportation flights through Boeing Field, King County has opened a viewing area for volunteers to observe these flights to keep track of the numbers of people being deported and to record the tail numbers of the planes to keep records of which planes are used for such flights.¹⁰² However, activists have reported that, despite a stated intention to provide transparency if flights began again¹⁰³ King County has been reluctant to assist in providing information about these flights so volunteers have been forced to keep track through pen and paper.¹⁰⁴ ICE refuses to release head count or other passenger information regarding these flights through anything besides a Freedom of Information Act request.¹⁰⁵ Further, when ICE does release video footage of detainees being placed on deportation flights, the camera is always out of focus, making it impossible to tell what kinds of restraints are being used on the detainees.¹⁰⁶ Further, ICE fails routinely to follow through on their own protocol for safety when boarding. Shackled detainees are supposed to be assisted up the stairs on such flights, but are regularly left to traverse the steps alone, leading to falls.¹⁰⁷ The resumption of deportation flights out of King County allows for the continuation of human rights abuses to be carried out by ICE against the detainees at the Northwest Detention Center and throughout the United States. Two ambulances took detainees from NWDC due to suicidal attempts, making this the fourth or fifth time that such incident took place at NWDC. On October 17th, 2023, volunteers observing deportation flights out of Boeing Field noted the use of what appeared to be a device called the WRAP¹⁰⁸. Witnesses observed 4-6 workers carrying

⁹⁵ [Justice department sues King County over ban at Boeing Field | AP News](#)

⁹⁶ <https://apnews.com/article/ice-deportation-flights-washington-da6db4222ceb42c234408d559c566204>

⁹⁷ [OPINION | King County, Port of Seattle Must Demand Humane Conditions for ICE Deportation Flights](#);

⁹⁸ [ICE Air Flights Resume at Boeing Field - Center for Human Rights](#)

⁹⁹ [At Seattle's Boeing Field, Real-Time Video Offers a Rare Glimpse of America's Troubled Deportation Flights](#)

¹⁰⁰ [ICE Air deportation flights resume at Boeing Field in Seattle - Center for Human Rights](#) [OPINION | King County, Port of Seattle Must Demand Humane Conditions for ICE Deportation Flights](#)

¹⁰¹ *Id.*

¹⁰² [At Seattle's Boeing Field, Real-Time Video Offers a Rare Glimpse of America's Troubled Deportation Flights](#)

¹⁰³ [Executive Constantine issues new executive order to increase transparency should deportation flights resume at King County International Airport - King County, Washington](#)

¹⁰⁴ *Id.*

¹⁰⁵ *Id.*

¹⁰⁶ *Id.*

¹⁰⁷ *Id.*

¹⁰⁸ La Resistencia Facebook post October 25th, 2023

<https://www.facebook.com/photo?fbid=711111171052405&set=pcb.711111197719069>: [ICE Orders Dozens of Straitjacket-Like Restraints - TYT Network](#)

an immigrant onboard a deportation flight. Witnesses did not receive any explanation as to why the individual was carried and not allowed to walk but have raised concerns as to the use of WRAP devices. The restraint device in question during these observations, known as the WRAP, is used by ICE and other law enforcement agencies claiming it can restrain a person without restricting breathing. An independent investigation from The Journal, The Guardian found that no testing requirements, safety guidelines or certifications exist in the US for full body restraint systems like the WRAP¹⁰⁹. WRAP devices have been under investigation, and community groups have filed civil rights complaints to the Department of Homeland Security Office for Civil Rights and Civil liberties, calling the devices a form of torture that violates federal laws after their use in 2020 and 2021¹¹⁰. ICE records received by the UW Center for Human Rights in FOIA litigation reveal that the WRAP has been used at least once to restrain a person with mental illness during ground transportation from Oregon to Tacoma for detention at the Northwest Detention Center¹¹¹. More recently, on March 12th, 2024, it was observed that someone was transferred onto a deportation flight on a medical stretcher from the bus that transports individuals from the Northwest Processing Center. It was noted by observers, such as Maru Mora Villalpando that the plane had parked so that observers inside the room that King County provides for transparency were unable to observe the boarding¹¹². According to a piece on ProPublica, it is common for ICE to use 5-point restraints- wrists, ankles and in chains- even though ICE statistics show¹¹³ that less than half the people deported in 2023 have any kind of criminal conviction, or any serious felonies that could suggest a risk to others on board¹¹⁴.

6. Lack of corporate human rights due diligence, oversight, and protection for migrants under GEO custody

GEO Group run facilities are unaccountable, constantly protected by laws and courts. The corporation did not respond to complaints of human rights abuses. GEO has not responded to UN Communications that asked “to identify, prevent, mitigate, and remedy the negative human rights impact that your company could have caused, contributed to or been directly linked in immigration detention facilities, including at the NWPC, as set out in the United Nations Guiding Principles on Business and Human Rights”.¹¹⁵ Despite having a Global Human Rights Policy¹¹⁶ and publishing “Human Rights and ESG reports” since 2018¹¹⁷ GEO has not addressed the concerns communicated formally by several Special Procedures regarding the human rights of those at the NWDC. GEO’s Human Rights Due Diligence Assessment looks like an attempt to create a marketing image for the company. Although it states that to conduct the assessment it engaged with stakeholders, it is evident that engagement did not include stakeholders that filed international complaints, were part in lawsuits, documented human rights abuses for years, or represent people abused at immigration Detention Centers¹¹⁸. GEO also does not participate in community stakeholder meetings organized by the Office of Civil Rights. It is evident that GEO does not have a mechanism to implement international human rights recommendations, and follow-up with them. The references to self-assessments of GEO performance have become outdated, and GEO only made references to negative findings regarding their performance done by the Office of the Inspector General in 2017, more than seven years ago. GEO does not take independent reports seriously. Instead of preventing, mitigating, or remedying, its human rights annual

¹⁰⁹ [Safety claims for body restraint used by US authorities based on disputed study | US news | The Guardian](#)

¹¹⁰ [RE: Complaint Regarding ICE's Use of The WRAP as a Restraint Device](#)

¹¹¹ [What's ICE Hiding? A look inside UWCHR's lawsuit - Center for Human Rights](#)

¹¹² <https://twitter.com/democracynow/status/1767537931974070687?s=20>

¹¹³ [ICE Enforcement and Removal Operations Statistics](#)

¹¹⁴ [At Seattle's Boeing Field, Real-Time Video Offers a Rare Glimpse of America's Troubled Deportation Flights](#)

¹¹⁵ [George C. Zoley Chief Executive Officer the GEO Group Inc. 22 April 2020](#) UN Special Procedures Letter to GEO regarding the NWDC.

¹¹⁶ [Geo Global Human Rights Policy](#)

¹¹⁷ [GEO Group ESG](#)

¹¹⁸ [GEO Human Rights Due Diligence](#) According to the GEO Due Diligence report they conducted 26 interviews with internal and external stakeholders and the list did not include any internal or external stakeholder concerned about human rights at the NWDC.

report was used to criticize the OIG report as “flawed”¹¹⁹. None of GEO human rights annual reports indicates any measure “introduced to respond to the concerns raised above regarding access to appropriate health care and unhygienic conditions” at the NWIPC¹²⁰. Despite repeated inquiries from the UN Special Procedures regarding the situation at the Northwest Detention Center (NWDC), GEO Group has failed to provide adequate responses to crucial questions concerning human rights violations. Specifically, the company has not addressed inquiries regarding operational-level grievance mechanisms established to address identified grievances and remediate them directly, nor has it provided updates on independent inspections or investigations conducted at the NWDC or explained the absence of such investigations. Furthermore, GEO Group has not disclosed information regarding the number of detainees released to non-custodial alternatives to detention or specific measures implemented to address concerns related to access to appropriate healthcare, preventive measures for COVID-19, and mental health care for detainees. Additionally, there is no indication whether company staff receive training on relevant national and international human rights law and standards, including the United Nations Guiding Principles on Business and Human Rights. This lack of transparency and responsiveness from GEO Group raises serious concerns about its commitment to addressing human rights abuses within its facilities and complying with international standards.

The lack of accountability has already become apparent in 2024. The facility saw the beginning of the year with yet another hunger strike and a lawsuit by Washington’s Attorney General due to GEO Group Inc. denying entrance several times to Department of Health and Labor and Industries inspectors responding to over 300 complaints from people detained at NWDC. Washington Attorney General Bob Ferguson said in a statement *“These latest reports are alarming. Unfortunately, they are consistent with the concerns my office has long had regarding the unlawful and unsafe conditions at the Northwest ICE Processing Center.”*¹²¹. In January of that year, Ferguson sent a letter to the Department of Homeland Security’s inspector general calling for an investigation into “unsanitary living conditions”¹²² and how GEO actions in Tacoma have “put detainee health, safety, and welfare at risk.”.

Due to human rights concerns, the Washington State Legislature passed House Bill 1470 on May 10th 2023¹²³. The law required the Washington State Department of Health to adopt a range of health and safety rules and to regularly inspect facilities to ensure compliance with new health standards.¹²⁴ HB 1470 made it compulsory for the Washington State’s Department of Health (DOH) to conduct inspections of private detention centers¹²⁵. HB 1470 states that “[p]rivate detention facilities must comply with the following minimum requirements: (a) A detained person should have a safe, clean, and comfortable environment that allows a detained person to use the person’s personal belongings to the extent possible; (b) Living areas, including areas used for sleeping, recreation, dining, telecommunications, visitation, and bathrooms. Bathrooms must be cleaned and sanitized daily; (c) A detained person, upon admission to a private detention facility, must be issued new clothing and new footwear for both indoor and outdoor use and for protection against cold and heat. Clothing issued must be regularly laundered and replaced at no cost once no longer hygienic or serviceable; (d) A private detention facility must provide laundry facilities, equipment, handling, and processes for linen and laundered items that are clean and in good repair, adequate to meet the needs of detained persons. Laundry and linen must be handled, cleaned, and stored according to acceptable methods of infection control including preventing contamination from other sources. Separate areas

¹¹⁹ GEO Active Community Engagement report.

¹²⁰ George C. Zoley Chief Executive Officer the GEO Group Inc. 22 April 2020 UN Special Procedures Letter to GEO regarding the NWDC.

¹²¹ Shapiro, Nina. “Ice Center in Tacoma Used ‘Chemical Agents’ on Immigrant Detainees.” *The Seattle Times*, The Seattle Times Company, 4 Feb. 2023, www.seattletimes.com/seattle-news/northwest-ice-center-uses-chemical-agents-on-immigrant-detainees/

¹²² See testimonies from Detainees in the exhibits over living conditions: [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]

¹²³ UW Report: State and Local Authority to Regulate the Northwest Detention Center

¹²⁴ Joya, Annabell. “Media Release: Governor Inslee Signs Bill Protecting People in for-Profit Detention - Columbia Legal Services.” *Columbia Legal Services - Seeking Justice Together.*, 12 May 2023, columbialegal.org/media-release-governor-inslee-signs-bill-protecting-people-in-for-profit-detention/

¹²⁵ Idem

for handling clean laundry and soiled laundry must be provided and laundry rooms and areas must be ventilated to the exterior; (e) Basic personal hygiene items must be provided to a detained person regularly at no cost; (f) A private detention facility shall provide a nutritious and balanced diet, including fresh fruits and vegetables, and shall 11 recognize a detained person's need for a special diet. A private detention facility must follow proper food handling and hygiene practices. A private detention facility must provide at least three meals per day, at no cost, and at reasonable hours; (g) Any food items in the commissary must be available at reasonable prices taking into account the income and financial circumstances of detained persons; (h) Telecommunications services must be provided free of charge to detained persons and any communication, whether initiated or 20 received through such a service, must be free of charge to the detained person initiating or receiving the communication. Each detained person must be eligible to use the telecommunications services described in this subsection (2)(h) for at least 60 minutes on each day of the person's detainment. Private detention facilities must not use the provision of telecommunications services or any other communication services to supplant in-person contact visits any detained person may be eligible to receive; (i) In-person visitation must be available daily. Visitation rooms must allow for the presence of children and personal contact between visiting persons and detained persons may not be restricted. A detained person may receive reading and writing materials during visitation; (j) Solitary confinement is prohibited...¹²⁶" The bill also ensures legal ramifications of detention centers' breaching DOH standards, adding fines and allowing detainees to seek legal remedy against NWDC for monetary compensation¹²⁷.

Shortly after the passing of HB 1470, the GEO Group violated the bill by denying DOH inspectors' entry to its facility, due to guidance from ICE ¹²⁸. DOH received over two-hundred and eighty complaints of immigrants expressing how human rights abuses persisted¹²⁹, including contaminated meals and lack of payment of Washington state Minimum wage labor laws. DOH and Department of Labor inspectors arrived at NWDC on several occasions, only to be rejected entry to inspect and to investigate these allegations¹³⁰. Even though DOH and DOL inspectors were granted a warrant by the Pierce County Superior Court to legally enter and to fulfill their obligations of inspecting NWDC under HB 1470, the GEO group still did not allow them to inspect the conditions of NWDC¹³¹. Then GEO filed a lawsuit against Washington state, seeking to find HB 1470 unconstitutional¹³².

According to news reports and court documents, claims that fully complying with the state law would put it in breach of its contract to operate the facility, raising the prospect of \$160 million in lost revenue. GEO also says that complying with HB 1470 would require building upgrades estimated to cost over \$3 million, including a complete redesign of the heating, cooling, and ventilation system at the detention center¹³³. **On March 11th, 2024**, a federal judge issued a preliminary injunction to temporarily block inspections by the State¹³⁴. U.S. District Court Judge Benjamin Settle said the law **discriminates against GEO** as the only company operating a private detention facility in Washington and subjects GEO to "substantial economic burdens." Oversight, in the form of HB 1470 is now blocked which prior to the ruling was the only domestic legislation providing oversight into the privately run detention facility. Without being able to enforce HB 1470, the state legislature has exhausted all domestically available remedies to inspect and protect the human rights of individuals inside. In all, these first-hand accounts of

¹²⁶ <https://lawfilesext.leg.wa.gov/biennium/2023-24/Pdf/Bills/House%20Bills/1470.pdf?q=20240313184757>

¹²⁷ Joya, Annabell. "Media Release: Governor Inslee Signs Bill Protecting People in for-Profit Detention - Columbia Legal Services." *Columbia Legal Services - Seeking Justice Together*, 12 May 2023, columbialegal.org/media-release-governor-inslee-signs-bill-protecting-people-in-for-profit-detention/

¹²⁸ [Washington State Denied Entry into NWDC](#).

¹²⁹ Deng, Grace. "State Inspectors Denied Entry to Privately-Run Immigration Detention Center in Tacoma. Washington State Standard." *Washington State Standard*, 25 Jan. 2024, washingtonstatestandard.com/2024/01/24/state-inspectors-denied-entry-to-privately-run-immigration-detention-center-in-tacoma/.

¹³⁰ Idem.

¹³¹ Idem.

¹³² Idem.

¹³³ GEO Group v. Inslee Case NO. C23-5626 BHS, available at [The GEO Grp. v. Inslee, C23-5626 BHS | Casetext Search + Citator: State inspectors denied entry to privately-run immigration detention center in Tacoma | The Spokesman-Review](#)

¹³⁴ [Court blocks state inspections of federal immigration facility in Tacoma](#).

multiple people prove that HB 1470 has been ineffective in mandating NWDC, ICE, and GEO group to refrain from compromising the human rights of its detainee.

In conclusion, despite official recognition of human rights abuses at the Center by Washington State authorities, it is shown once again, that it is impossible to regulate accountability for human rights violations at private detention facilities, leaving immigrants without defense.

7. GEO group's Failure to Comply with Court Ordered Wage Requirements.

In December of 2023, the Washington Supreme Court unanimously ordered the Northwest Detention Center to pay over \$23 million to the detainees and to Washington State for violating Washington's minimum wage laws due to its policy of paying detainees \$1 per day.¹³⁵ The decision has been appealed to a federal appeals court, but for the moment, the Washington Supreme Court decision stands. In 2021 a jury found GEO Group guilty of violating the minimum wage law and ordered \$17 million in back pay to be awarded.¹³⁶ A federal court later included a penalty of \$5.3 million which was determined to be the amount of money that GEO Group was unjustly enriched by with the \$1 per day payment policy.¹³⁷ GEO Group claimed that they were exempt from the state's minimum wage laws due to a law allowing for publicly owned prisons and treatment facilities to pay less than minimum wage. The Washington Supreme Court ruled in favor of the trial court, specifying a distinction between private and public detention facilities and thus, detainees at a private facility were considered to be employees under state law.¹³⁸ However, despite the legal victory, detainees report that the only thing that has changed since the ruling is that they are no longer allowed to work, and the cleanliness of the place has deteriorated significantly.¹³⁹ To avoid paying detainees a wage that complies with state law, detainees are now unable to have access to cleaning supplies to clean their own units and common spaces which is having detrimental effects on the cleanliness and hygiene of the facility.

A detainee who was inside the detention facility who goes by [REDACTED], prior to the federal court case, in an affidavit said “ There was a worker program. So, when I first got there, I decided, hey, I'm going to work in the kitchen. Not so much because I knew I was only being offered a dollar. Right. And I wasn't really looking to work because of the dollar. It was more like getting out of my unit, you know, um, staying active, you know, trying to make my time pass a lot faster. And plus working in the kitchen, you're eating a little bit better, right? I started working in the kitchen. Basically, you're working with prep. You're helping prepare the food. Not really cooking. You're just more like cutting up vegetables. Bringing stuff for the cooks, washing dishes, putting stuff in the walking fridges. I did that for a little bit until the worker program was suspended. It was suspended, I think due to a lawsuit basically arguing that since Geo is a private detention center which is under a civil proceeding and not criminal, they must pay you the minimum wage. And I think that case was decided on. They won and Geo was ordered to pay. I can't remember the exact number. I think it was like, I don't know, like \$20 million. So basically, anybody that worked at a detention center from 2014 on, they would have to pay for those hours. so, I worked there for about five months, they took away the worker program. That was pretty much the only other thing that you can do while you were there to kind of make your time go by¹⁴⁰. Other detainees, as shown in the Exhibits from Detainees, echo the worry that the Wage lawsuit will have multiple impacts on them.¹⁴¹

8. The United States is Obligated to Ensure the Rights of All Persons within its Jurisdiction and Under its Custody and cannot Contract Away its Responsibilities and Accountability to Private Parties

¹³⁵ [Private immigration prison in Tacoma ordered to pay \\$23M in minimum wage case | The Seattle Times](#)

¹³⁶ [GEO ordered to pay \\$23.2M in detainee minimum wage cases | The Seattle Times](#)

¹³⁷ *Id.*

¹³⁸ <https://www.courts.wa.gov/opinions/pdf/1017863.pdf>

¹³⁹ University of Washington Center for Human Rights interview with [REDACTED]

¹⁴⁰ Affidavit de [REDACTED] Exhibit:

¹⁴¹ See testimonies from Detainees in the exhibits: #2 [REDACTED]

The United States is obligated to respect, protect, and fulfill the fundamental human rights of all persons held in its custody, including those detained under its authority in privately held detention centers. The United States' failure to ensure the right to life of immigrants held under its authority at the NWDC, competent and safe medical care— and specifically, the right to personal integrity of immigrants held in solitary confinement which led to torture and other abusive treatment, is a clear violation of its obligations under the International Convention on Civil and Political Rights (ICCPR), Convention against Torture (CAT), and the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), as well as the American Declaration of the Rights and Duties of Man. These instruments protect rights relevant to conditions in immigration detention, most notably the rights to life and freedom from inhuman treatment. Solitary confinement is a well-established violation of these rights. Concerning the United States' obligation to respect the fundamental rights of persons held in its custody, according to the law of state responsibility, states are responsible for the conduct of a person or entity which is not an organ of the state but which is empowered by the law of the state to exercise elements of "governmental authority."¹⁴² This includes private companies or parastatal entities involved in the carrying out of functions of a public character normally exercised by state organs and "a State Party is not relieved of its obligations under the Covenant when some of its functions are delegated to other autonomous groups."¹⁴³ Additionally, the InterAmerican Commission on Human Rights (IACHR) has stated: "States are responsible not only for the direct actions of their agents but also for that of third parties acting at the request of the State or with its tolerance or acquiescence."¹⁴⁴ Similarly, the UN Working Group on the use of mercenaries stated that "states retain their obligations when they privatize the delivery of services that may have an impact on the enjoyment of human rights."¹⁴⁵ The International Law Commission's commentary attached to the draft Articles of State Responsibility sets out a two-prong test for establishing state responsibility: firstly, the entity was empowered under internal law; and, secondly, the conduct concerned governmental or public activity.¹⁴⁶ Private companies contracted to run immigration detention centers, such as GEO, clearly meet these two prongs. These companies are empowered under United States domestic law to run facilities inherently exercising functions of a public character – detention. Consequently, the United States is responsible for any human rights violations committed by these companies in the performance of their contractual duties. The United States (ICE) cannot escape its responsibilities and obligations through contracting out the running of immigration detention centers to GEO. The international human rights obligations owed to the immigrants detained under the United States' direct orders are non-delegable.

The IACHR has already expressed its deep concern about private contractors who run several immigrant detention centers in this country, according to which the contractors were generating significant profits at the detainees' expense, in many cases said companies save even more money by hiring these individuals, to perform basic maintenance tasks in the detention centers for 1\$US dollar per day concern about private contractors such as GEO Group, generating profits at detainees' expense, and that they pay 1\$US dollar per day¹⁴⁷. The IACHR can demand the United States to expect due diligence from GEO. The United Nations Guiding Principles on Business and Human Rights clearly outline that private actors and business enterprises have a responsibility to respect human rights, which requires them to avoid infringing on the human rights of others and to address adverse human rights impacts with which they are involved when they happen. If human rights complaints are brought to corporation's attention they must prevent, mitigate, and remedy. Access to effective remedy is also a core component of the Guiding Principles. Under the Guiding Principles, companies that manage and run immigration

¹⁴² Int'l Law Comm'n, Rep. on the Work of the Fifty-Third Session, U.N. Doc. A/56/10, at 42 (2001).

¹⁴³ B. d. B. et al. v. The Netherlands, Communication No. 273/1989, U.N. Doc. Supp. No. 40 (A/44/40), at 286 (1989)

¹⁴⁴ Inter-American Comm'n on Human Rights, Rep. on the Human Rights of Persons Deprived of Liberty in the Americas, OEA/Ser.L/V/II. Doc.64, at 188 (2011).

¹⁴⁵ UN Human Rights Council Working Group on the use of mercenaries, Rep. on Impact of the use of private military and security services in immigration and border management on the protection of the rights of all migrants, U.N. Doc. A/HRC/45/9 (July 9, 2020).

¹⁴⁶ Int'l Law Comm'n, Rep. on the Work of the Fifty-Third Session, U.N. Doc. A/56/10 (2001).

¹⁴⁷ IACHR [Business and Human Rights: Inter-American Standards](#), 2021.

related detention facilities have an independent responsibility to respect the rights of those detained, including their physical and mental health and well-being. In addition, “[w]here business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes” (Guiding Principle 22). In this regard, the report of the Working Group on human rights and transnational corporations and other business enterprises, on the concept of access to effective remedies under the Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework (A/71/162). Moreover, business enterprises have an independent responsibility to respect internationally recognized human rights (Guiding Principles 11 and 12). To discharge this responsibility, they are expected to conduct human rights due diligence in meaningful consultation with affected stakeholders (Guiding Principles 17-21).

In this regard, the UN Standard Minimum Rules for the Treatment of Prisoners (also known as the Mandela Rules), which provide guidance on the treatment of detainees and prisoners, the recruitment of trained and skilled personnel, and inspections, among other things. Rules 12 to 18 and 24 to 35 of the Mandela Rules, regarding accommodation and health-care services. Rule 32 indicates that the relationship between health-care professionals and detainees shall be governed by the same ethical and professional standards as those applicable in the community.

In response to the GEO Group’s involvements in the **Use of Chemical Agents, Solitary Confinement, Death and Suicide attempts in 2024 as well as the ongoing unsanitary conditions** it is important to highlight to the reports of the Working Group on the use of mercenaries focusing on the use of private security providers in places of deprivation of liberty, including immigration-related detention facilities (A/72/286 and A/HRC/45/9). In its general comment No. 31 (CCPR/C/21/Rev.1/Add.13), the Human Rights Committee finds that States’ obligations to protect and fulfill human rights extend beyond their own agents and encompass protecting against human rights abuses by third parties, including private companies, and to take positive steps to fulfill human rights. Furthermore, to fulfill its obligations, a State must take appropriate measures “to prevent, punish, investigate or redress the harm caused by acts of private persons or entities” (para. 8).

Petitions

The grave situation at the **Northwest ICE Processing Center** requires the intervention of the Inter-American Commission of human rights and following up with previous recommendations. We ask the IACtHR to:

1. Issue a press release expressing concern for: 1) death in custody: 2) the poor detention conditions at the Center including a recent fire without evacuation: 3) continued use of solitary confinement as punishment and as medical isolation; and 4) lack of access to information: 5) need of an independent investigation on the deaths of immigrants in custody or deported to death: 6) need to cease its policy of retaliation against detained migrants on Hunger Strikes, and to cease its policy of solitary confinement as a retaliation mechanism: 7) align detention conditions in line with the United States international human rights obligations, in line with the Mandela Rules and in line with ICE standards which are currently not being followed.
2. Send a letter immediately to the US requesting the release and protect the named beneficiaries listed in this brief whose testimonies and consent were provided orally to representatives during visits or calls and recommend the release and protection of the immigrants mentioned.
3. Request the US government to engage immediately with petitioners within the process of this precautionary measures and establish **an in person follow up working meeting** to discuss the individualized attention to specific named beneficiaries.
4. Request an unannounced Office of the Inspector General inspection of the NWDC, investigation and report into detention conditions, deaths in custody, armed intervention by GEO, food, water, sanitation, family and legal visits, solitary confinement, isolation as retaliatory practices, record keeping of people detained, transfers, complaints of sexual assault, and disciplinary practices, use of discretion to release migrants most at risk during the pandemic, and other issues described on this brief.

5. Urge the Federal Government to end the contract with GEO at the NWDC immediately and close it as an effective measure of implementing the IACMR recommendations.
6. Include these concerns in the IACMR annual report.
7. Grant a bilateral meeting with the commissioner rapporteur in charge of the United States with petitioners.
8. Grant a public hearing on the precautionary measures, the next time you have a session in Washington DC.
9. Seek an invitation from the United States to conduct a site visit to conduct an independent investigation into the alleged abuses and mistreatment of immigrants held at NWIPC.
10. Work with the Rapporteur on Economic, Social and Cultural Rights to ask the United States to demand GEO Group to respect and uphold the Inter-American Commission of Human Rights Standards on Business and Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights and act with due diligence.

Considering these concerns, we urge you to consider measures to work with the United States in shifting away from private, for-profit ICE detention centers.

Thank you for your attention to this matter,



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Villalpando
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La Resistencia

Exhibits: Testimonies and consents provided to La Resistencia

The individuals listed here are unable to provide written consent to be delivered to the Inter-American Commission as they are currently detained, with several of them on hunger strike. However, they consent to the international organizations using their names in public and/or confidential communications sent to the State or the company. They have given their consent through La Resistencia and urge all international organizations to speak out about the severe situation they are experiencing.

1. [REDACTED]
2. [REDACTED], Pakistan (prolonged)
3. [REDACTED] (India) (asylum seeker)
4. [REDACTED] (México) enfermo. Tiene seizures, pendiente head CAT scan
5. [REDACTED] (México) (accused unjustly of having amphetamines)
6. [REDACTED] (Micronesia) detained for 2 years, gassed, and stripped search.
7. [REDACTED] (Mongolia), prolonged detention and disproportionate bond
8. [REDACTED] (El Salvador) detained for 2 years, witness of Mr. Daniel Dead, transferred to Texas.
9. [REDACTED] (Mexico) detenida desde Sept 2023 (transgender woman in a male section)
10. [REDACTED], hunger striker, lost 26 pounds, wants a bond.
11. [REDACTED] (wants a bond)
12. [REDACTED] 11 months, bond

13. [REDACTED]
 14. [REDACTED] (prolonged)
 15. [REDACTED] (denied bond)
 16. [REDACTED]
 17. [REDACTED]
 18. [REDACTED],
 19. [REDACTED]
 20. [REDACTED] (sexually assaulted campaign to free him)
 21. [REDACTED] (rushes)
 22. [REDACTED] (Interviewed September 20, 2023) (prolonged, sick, gallbladder, hepatitis B and A, several hospital visits)

1. [REDACTED] (January 2024) (Prolonged detention, sexual assaulted, sick with mold in his lungs)

My name is [REDACTED]. First and foremost, I want to bring attention to the alarming discovery that **my blood tested positive for black mold**. Following a recent cortisone shot, medical staff informed me of a significant presence of "aspergillus fungi" in my blood. I am scheduled to see a pulmonologist at Harborview for further evaluation, as I suspect this mold exposure may be affecting my health. I intend to pursue a CAT scan of my lungs and file a grievance regarding the mold infestation within the facility. The prevalence of water leaks, particularly in the kitchen, only exacerbates this issue.

In addition to health concerns, I discussed a sexual assault case and a recent incident of sexual harassment. Despite GEO dismissing my grievances as "unsubstantiated," the Office of the Inspector General acknowledged gaps in the investigation and promised changes. I am determined to pursue justice and will file a new grievance, leveraging the OIG's letter as evidence. Furthermore, I noticed discrepancies in the sexual violence hotline flyer's language and intend to address this inconsistency. I remain concerned about potential retaliation from ICE, especially after reading about another detainee's experience with sexual assault allegations being rescinded by ICE.

In conclusion, I want to be released, for swift action regarding the mold infestation and the resolution of my grievances, while remaining vigilant against potential retaliation and continuing to advocate for justice.

2. [REDACTED] (Interviewed on January 10th, 2024) Prolonged detention, diabetic.

My name is [REDACTED], and I'm currently detained at the NWDC. I've experienced the deteriorating conditions firsthand, and I believe it's crucial to shed light on the ongoing issues within this facility.

Conditions here are worsening day by day. Despite the promise of cleanliness, cleaning schedules are often skipped, leaving detainees to clean up after themselves. The kitchen is especially concerning, with dirty dishes and unhygienic conditions. Overcrowding in my dorm makes the air stale and contributes to the spread of illnesses among detainees.

I feel frustrated and disillusioned. It seems like my story falls on deaf ears, and nothing changes. The asylum office's failure to address cases within the promised 90 days adds to the sense of hopelessness among detainees. Additionally, recent court decisions, like the GEO wages case from January 5th, leave us wondering about our futures.

Since the start of the pandemic, I've been quarantined 29 times and tested positive for COVID three times. The lack of timely medical treatment exacerbates the emotional toll on detainees, leading some to attempt suicide. Officers often shout and demean us, treating us like animals in completely inhumane conditions.

I was part of a lawsuit against the COVID conditions in detention, which was settled. However, I feel abandoned by the attorneys who represented us. While they received substantial fees, I've seen little improvement in our situation. GEO and ICE continue to violate the terms of the settlement, further endangering detainees' well-being.

Despite being **diabetic and needing insulin three times a day**, the food provided exacerbates my condition. There are no opportunities for exercise, worsening my health.

While ICE hasn't physically forced me to eat, I've heard of instances where detainees were coerced into eating under duress. Detainees on hunger strike are often separated and intimidated by ICE agents.

I haven't had recent contact with ICE officials, and their lack of communication about our release or legal status adds to the uncertainty and anxiety among detainees.

I am aware of several other detainees who are also on strike, with ICE responding by separating and threatening them. The denial of access to asylum officers further compounds the distress faced by detainees.

3. [REDACTED] (Interviewed on January 10th, 2024)

My name is [REDACTED]. I'm reaching out to communicate some urgent concerns regarding my situation and the conditions within this detention facility. I've been struggling with **depression** for the first time in my life, feeling overwhelmed by the sense of betrayal regarding the promises of opportunity in America. I feel scared, alone, and under immense mental stress. Despite my desire to share my story and seek asylum, **I haven't had the chance to meet with an asylum officer. Additionally, I was given incorrect information about my eligibility for protection in the US based** on my lack of relatives here, which has added to my distress, especially considering the violence my family has faced back home.

Regarding my current state, I recently broke the hunger strike because I was feeling unwell. Thankfully, I wasn't physically forced to eat, but the medical team strongly advised me to do so for my health. I'm aware of 21 people who are still on strike, but I'm not fully informed about their conditions or the progress of the strike. ICE officials visited me shortly after the strike began, but their interactions were brief and unproductive. They didn't provide any meaningful response to our demands or address our grievances. Unfortunately, I don't know the names of the ICE personnel who visited me or the specific details about the individuals sent to the hospital. ICE's lack of transparency and communication further exacerbates the uncertainty and fear among detainees. **It's crucial that our voices are heard, and our rights respected during this challenging time.**

4. [REDACTED] (Interviewed on January 10th, 2024)

My name is [REDACTED]. I'm reaching out to share some urgent concerns regarding the conditions within the detention facility where I'm being held. After participating in the hunger strike for three days, I decided to end it about two weeks ago as I felt there wasn't going to be any immediate result. However, I'm actively working with other hunger strikers to **brainstorm alternative ways of pushing back against the unacceptable conditions we're facing. The treatment I'm receiving here feels worse than what I experienced in prison.** I feel like I don't have access to adequate legal remedies, despite spending significant time researching in the legal library. Many detainees,

including those with disabilities, struggle to assert their rights due to a lack of resources and accommodations. There are several issues with the facilities, such as concerns about the microwaves not being safe and difficulties with the commissary system. Additionally, the limited outdoor time, poor food quality, and inadequate medical treatment contribute to the mental stress we endure daily.

I recently stopped taking medication for seizures due to severe side effects, including fatigue, grogginess, and hallucinations. Unfortunately, I haven't received any updates on a head scan I had done three months ago, despite following up with medical staff.

5. [REDACTED] - January 27, 2024, Visit:

My name is [REDACTED]. During a routine cell search, a GEO guard accused me of drug possession, citing stamps from my penpal that allegedly had traces of amphetamine. Despite my protests and a hearing on January 18 with ICE present, I was found guilty and sentenced to two days in solitary confinement. Lindsley assured me it wouldn't affect my record, but I doubt his word. I fear this incident will tarnish my immigration case.

Officer Suafoa was the one who found the stamp, and despite my request, there will be no further investigation. I suspect this accusation stems from my involvement in the hunger strike and advocacy efforts.

Aside from this incident, I've noticed unsanitary conditions within the facility, including old uniforms, broken shoes, and fungus on the walls. I'm taking steps to file a complaint with the Department of Health

6. [REDACTED]

I'm being held here for something I've never done, and they made a mistake in my documentation stating I was convicted for a rape of a child, which is totally false. If I was in prison, people would be trying to get me. I tried to explain it was a false accusation, but nobody listened and one person who is from my island told me he will never forget what they are accusing me of. He went back and told everyone on the island these lies about me, and harassed and threatened my family.

I feel I've been held hostage. They've gassed me twice in this facility. Now the judge is telling the BIA the wrong year of my removal order. I feel like they're playing with my life. It hurts me every time I talk about it. At the end of the day, I'm a human being, too.

I'm having a hard time breathing, even going upstairs. I didn't have this problem before GEO gassed us in February 2023. Now I have ongoing health issues. Even talking about it makes it hard to breathe. I've been taking some medication. The mental health staff said you've got to work on your diet, you're overweight, you need to watch what you're eating. I said what am I gonna do? They say just sleep, meditate. But when I wake up, I'm here, looking at the wall and what's beyond my unit and I cannot be alright. I'm physically and mentally suffering. When you've been accused of something you didn't do and you're serving time for it, how is it going to be alright? Only if I didn't wake up would it be alright. I want them to release me and clear my record. I don't know when they're going to deport me back, but it sounds like it will be soon. I've asked ICE to clear my name with my government. I want the false allegations removed from my record because it's going to follow me home. I'm going to be a walking target.

Regarding recent events, I would be willing to participate in a press conference about what happened on February 1st. During that incident, a group of detainees, primarily Mexican, had a confrontation with authorities. Despite my attempts to calm the situation, I was charged along with others for allegedly inciting a riot. However, I did not engage in any violent behavior.

The response from the authorities was excessive. Gas canisters were thrown into the unit, causing distress and confusion among detainees. The subsequent entry of the CERT team, akin to GEO's SWAT, was intimidating and felt like a form of training on us. Many detainees, including myself, suffered from the effects of the gas.

Additionally, I want to bring attention to an incident in May 2023 when I was subjected to **a humiliating strip search by three guards**, including a lieutenant. Despite reporting this violation to the hotline, no action was taken, and these guards continue to work here, causing me ongoing distress and feelings of violation.

In conclusion, I seek justice and accountability for the excessive use of force during the recent incident and demand an investigation into the mistreatment I experienced during the strip search.

7. [REDACTED] (**Mongolia**)

[REDACTED] is a father and the primary provider for his two small children and wife. Given this responsibility, he has been doing all he can to be released. Upon learning he qualified for bond, he borrowed \$15k to set up a date for a hearing. During the hearing, the judge repeated that [REDACTED] did qualify for a bond but could not rule because of “*missing government information*” on *why he was there*. Despite this, [REDACTED] set up another hearing with the information provided; the judge again restated he was qualified but still denied him bond.

Upset but still determined to fight for bond, [REDACTED] left to reevaluate his options. Given the intense stress his wife has been going through financially and emotionally, [REDACTED]’s ICE deportation officer told him to submit supporting documents (e.g., letter) describing the situation with his family. As [REDACTED] was waiting for information, ANOTHER ICE agent, whom he did not know, visited him. The other officer informed him that they received the documents but would not grant bond because *they are going by the judge's decision*.

As he was talking to this other officer, his real ICE deportation officer walked in. [REDACTED] was now understandably confused as he asked how these two contradictory results were possible; his officer was also confused. [REDACTED] then asked for the other officer’s name and badge to cite this interaction as *proof and for future records*. The officer then became aggressive. [REDACTED] insisted on knowing that if this ruling was the case, *then what was the reasoning behind the judge's decision?* Again, the officer refused to answer.

As [REDACTED] insisted on further information, the officer sharply said he had nothing more to say to him. After asking the officer for his information one last time, the officer got up, banged on the door, and barked “Sit down N—.” The name of the ICE office is Scott Myer. Scott Myer then called the medical unit saying [REDACTED] had “mental problems”, to avoid accountability.

This act demonstrates the blatant racist biases in which the judge, ICE officer, and NWDC operate. To deny a human being bond DESPITE QUALIFYING, solely based on their skin COLOR. Not only that but stops an individual from any opportunity to see their family; a family who so desperately wants him and needs him back.

8. [REDACTED] (**El Salvador**) detained for 2 years and transferred to Texas.

Me van a mandar al hoyo porque me categorizan como un peligro para la seguridad de la "prisión", porque tengo tatuajes y soy de El Salvador. Nunca ha peleado con nadie, no soy violento ni con los guardias. La orden viene de Mrs Night. Los guardias están con chalecos anti puñales y guantes para poder pegar. Me quieren tener hasta que termine mi caso. Me dieron cargos de 'terrorista' aquí dentro por ser informante de La Resistencia. Estuve en

huelga de hambre, y porque fui el primer informante de la muerte del señor Daniels, me enviaron primero a confinamiento solitario como represalia y luego me trasladaron arbitrariamente a Texas.

Statement on March 13, 2024

In my unit A3, they just try to commit suicide by hanging and through the rail upstairs but unfortunately, he fell off from the top tier almost 10 feet to the floor. He was unresponsive for almost 40 minutes before the ambulance came and took him out. We don't know how his situation is right now. The medical staff came but couldn't do anything because they claimed that they didn't have professionals to help the detainee till the ambulance came. This is getting serious; detainees are crying when the incident happened. They thought he was dead. If nothing is done soon, people will be taking their lives one after the other.

9. [REDACTED] (Mexico) Detenida desde Sept 2023

I am a transgender woman from México and since I was detained in September 2023, they put me in a men's only unit. I am constantly punished, and they put me in "the hole" (solitary cell). They constantly target me because I am transgender and because I organize the detainees in my unit to demand better conditions. I ask for respect, better food, and that the cleaners of the facility stop harassing me. Also, the prices of the commissary are high. I want my freedom!

10. [REDACTED], hunger striker

I did 32 days of hunger strike and lost 26 pounds for freedom. I passed out a few times. I want someone to help me. I ask ICE agent to help me, but they didn't listen. If you want to know what hell is, come to the detention center and live here. Everyone here is sad and crying, we are human beings. I'm not dangerous for the community. **I don't know why I can get a bond.** I want to go. I want my freedom.

11. [REDACTED]

I have been in detention for over 7 months with no update on my case. I am deemed to be a 'danger to the community' and they denied bond despite my extensive reentry work in prison. I have already served my time for the nonviolent crime I committed. The conditions here are poor. I miss my daughters and grandchildren dearly and want nothing more than to be with them and accomplish my goals of working with women and adolescents who struggle with addiction.

12. [REDACTED]

I came from the Bureau of Prisons (BOP) and have been inside for 11 months. I have been trying to get a bond hearing for a while now, but they tell me that a bond hearing is discretionary, and they don't have to give me one. I want ICE to give me a bond to get back to my wife, who is currently all alone and struggling to pay the bills with just one income.

13. [REDACTED]

The food here is bad, the infirmary gives you what they want to give you without doing any sort of analysis about what your sickness is, also they only come to clean once a week, they have been giving us used underwear. They need to treat us better. I want my freedom.

14. [REDACTED]

“I can't handle this place anymore...it's like hell over here” I have been in detention **for almost a year**. I tried to get out through every avenue possible and yet ICE still refuses to decide on my case. I was part of a hunger strike and lasted 34 days, lost 35 pounds, and passed out 4 times to improve his conditions in the center. Everyone is crying all the time, medical needs are being ignored, and lots of people have already lost hope. We are not humans; we are just numbers.

15. [REDACTED]

They unfairly denied me a bond because of my nonviolent criminal history, even though I was granted bond in criminal court and already served my full sentence. They claim that I am a flight risk, despite not visiting Nigeria for 12 years and having a fiancee in the states. I have two brothers here in the states who are ready and willing to provide the bond when granted.

16. [REDACTED]

I have been in detention for 6 months and have yet to have any changes to my case. I am imploring that the public help with my situation by going and calling my representatives and signing my petition for release. I am in a unit that makes me feel unsafe, especially at night. My family is in California, and I had no visitors, and I have been struggling with loneliness.

Testimonios 2023

17. [REDACTED] **(Interviewed May 2nd, 2023)**

Everything is getting worse and worse. They're selling nothing in the commissary right now. There are too many of us in the unit and it is getting dirty. Found a “muela – a tooth” (molar) in the tray. The medical system is bad here – with me and my comrades. Girls with asthma are complaining about the ventilation, but the workers came and barely looked inside the vents, not cleaning them at all. People here are not getting the mental health care they need. Her psychologist is going to be gone for the next several weeks and that will be very hard for her. A few weeks ago, a guard yelled at her for trying to go to the rec yard with a bag of M&Ms. Ended up getting searched. All the guards are so rude to them. Also, the medical staff is rude and sometimes don't give you medications even that you have a prescription for. When I went to the SHU, they took away all my clothes. I've had to ask my cellmates for new clothes. They don't give us the bras or panties we need and deserve – even when they do, they are used.

18. [REDACTED] **(Interviewed May 2nd, 2023)**

There was a misunderstanding – he and his cellmates are like brothers and sometimes have horseplay. They were in the pill line and messing around a bit physically. Later in the day, the guards thought he stole that guy's sandwich or something, started harassing him, and so he tried to walk away, pretending not to hear anything they were saying. The guards tried to take him away, he resisted, it turned into a scuffle and [REDACTED] ended up getting beaten up quite a bit.

19. [REDACTED] **(Interviewed September 13, 2023)**

There are certain individuals here who treat us with indifference. Many of us feel this way. Here, they decide when to apply the rules based on their perception of who we are. I call it racism. At the very least, it is prejudice. My feeling is that rules should be applied to everyone equally. If you want to see a doctor, **you must wake up at 5am**

for “sick call”. That’s too early for us. If you don’t wake up, they mark it as a refusal. That’s not a refusal, it’s hard to wake up at that time for anyone. Plus, people here are depressed, so it’s especially hard. That causes people to give up. I have plantar fasciitis and the remedies they provide here don’t help at all. I feel I should be provided with the special shoes that I need. They say it’s against policy. It’ll help my pain. I’ve even given them documents from my old prison to prove that this is true. I’ve submitted grievances about this. The doctor that saw me, Johnson, made racist comments against me and bullied me. He said he wouldn’t send me to a podiatrist even if the administrator told him to. He referred to me as “homeboy,” and I felt that was racist – we have names, we’re not gangsters. Johnson said, “my son is married to a Hispanic woman,” and something like “you’re just lying just to get your Jordans and your Nikes.” I told him I didn’t feel safe with him and that he shouldn’t work her if he didn’t like it. I refused to let him give me a steroid injection until I got to see a podiatrist. He eventually kicked me out of his office. All I want is shoes that accommodate my foot condition. The doctor vented to me that he’s tired of detainees coming to him asking for shoes, and that he found it frustrating for staff at GEO to give some people their shoes and no other people. He also threatened that he was going to give ICE a copy of my special needs form, despite them not having any reason to have it. He also said, “I have browner in me than you.” I finally told him that he was a racist piece of shit. I don’t know his name off the top of my head, but he goes by PAC Johnson. There’s another doctor that I felt tricked me to get information that ICE could later use against me. He asked me for information about how I might have gotten these bumps on my head, so I told him that I got syphilis, probably from drug use. He put that in my permanent records, so I’m worried about who can see that now. The notes in my medical file also accuse me of “diagnosing myself” with plantar fasciitis, but that isn’t true. At my bunk, I have the name and A# of someone else with complaints about medical, and a second person with a similar shoe issue as me (Mr. [REDACTED]). “I wish for the individuals that work here that have personal opinions about immigration to keep it to themselves and not make it so evident. They have a way of talking down to us like we’re dumb and like we’re annoying for being here. We stay away from our needs out of fear of making them uncomfortable. It’s not okay. I respect other people’s opinion, but when we can pick up that the guards and staff here are against immigration and don’t like us, that isn’t right... I think places like this should be closed. We all have the right to provide for our families.”

20. [REDACTED] (Interviewed on September 13, 2023)

My name is [REDACTED] and on July 9, 2023, **I was sexually assaulted by a doctor** who touched my private parts and my body. Since then, I have not felt uncomfortable, I feel frustrated, No one here has been able to pay attention to me, only La Resistance and I thank you from the bottom of my heart. Right now, I would like to get a psychologist, but no, not even the immigration people help me, they don't help me at all. They wanted to deport me on the 17th only because they don't want the things that happen here to come to light. Many injustices happen here. They treat us like animals, and they don't give us food. This is all very frustrating. Emotionally, I feel very bad. How a doctor touches me and my parts. Emotionally I feel like a dirty person and when I am I am already in my room. There I am not with other people because that makes me feel very bad. I would like you to help me ensure that justice is done.

Additionally, I always look at the **smoke from the factory behind the detention center** at night and all day. All. It smells like shit, stinky. That's because the chemist behind the factory has the air conditioning. We absorb it all day long and our heads hurt. We are in bad shape. And that is very bad. The smell passes through the air conditioning and reaches us there and that conditioning comes from the one in the factory behind and it stinks. Very stinky from behind like shit. That's very bad for us. **Our lungs do not breathe pure air.** One person from Portugal has already been hit by cancer and here we have no attention, here they want us to die, like they have us addicted to being like crazy. TUs. I wish you could help us get this on television because of all the nonsense that everyone here does. That's why I tell you that I'm going to have that day. I would like someone to come represent me. Thank you.

21. [REDACTED] (Interviewed November 7, 2023)

I have been having rashes in my skin for one week. During your visit my lesions were taped, but I did not receive other medical care, no medicines. The unit I am living in everything is dirty, insects are present, everyone in the

unit is itchy. Here is a letter to share with you, with the word "warts" written on the back. Look and my hands, shoulders, and arms. They are all over my body.

22. [REDACTED] (Interviewed September 20, 2023)

My name is [REDACTED]. I have been here at immigration **for a year since** I entered immigration, when they detained me, and I presented myself to immigration. They arrested me and I presented the symptoms I had of stomach pains, and they told me that I only had gastritis and in the month of February-March they took a scan and told me that I had a gallbladder, that it does not work and that it has perforations and that has damaged the liver. And I also have hepatitis B, hepatitis A and I have no treatment, they only give me medication to calm down all this time. A year in which I have had neither an answer nor a solution. I have been out the last four times, I have been out to the hospital and the last time I was out was on August 2, where the surgeon told me that I had to have surgery on the 21st, between the 15th or the 21st of August, but he didn't. They have come to operate, and they have suspended me and now I have gone to ask him he told me that I had to wait and not until now and I continue to endure the pain all this time and it has increased more. I have lost weight, I have deteriorated, they have not given me an answer and I don't know what I can do. That's why I'm asking for help so you can support me and all this time I'm suffering from pain. I don't know if you could support me and I haven't committed any crime here in this country, I've come to emigrate and well I just have a record that is in my country and I'm carrying that out this coming month in my last court.

EXHIBIT C

LA RESISTENCIA



Executive Secretary
Tania Reneaum Panszi

Rapporteur for the United States: Commissioner Roberta Clarke

Rapporteur for People Deprived of Liberty Edgar Stuardo Ralón Orellana

Special Rapporteur on Economic, Social and Cultural Rights (REDESCA) Javier Palummo Lantes

Special Rapporteur for Freedom of Expression (RELE) Pedro José Vaca Villareal

Fernanda Alves dos Anjos. Coordinator: Precautionary Measures Unit

Inter-American Commission on Human Rights

May 10th, 2024

Re: Detained Migrants at Northwest Processing Center
PM 265-20

Dear Executive Secretary:

Alejandra Gonza, Executive Director of Global Rights Advocacy (“GRA”), Thomas Antkowiak, Director of the International Human Rights Clinic at Seattle University School of Law (“the Clinic”), and Maru Mora Villalpando, leader of La Resistencia, write to you to: submit updated information on the human rights situation at the Northwest Processing Center (NWIPC or NWDC), specifically on the following up of retaliation for witnesses of Mr. Charles Leo Daniels and different attempted suicides, immigrants held in indefinite solitary confinement or harassment of supporters outside.

Since our last update we can report several concerning facts. **First, there is no explanation on the lack of implementation of the measures recommended by the IACtHR in its Resolution.** Last week Immigration and Customs Enforcement (ICE) published its [U.S. Detainee Death Report](#): DANIEL, Charles Leo. The report itself has concerning and missing information regarding Mr. Daniel's situation, does not include any special considerations on the measures taken during the emergency caused by the Pandemic, not an explanation on why ICE kept Mr. Daniel was detained, showing disregard for international recommendations. He seems to have arrived at the Center around **April 2nd, 2020**, during the pandemic, after completing a sentence of 220 months in prison. ICE does not report it but he was probably put on quarantine before taking him to segregation. The

IACHR granted Precautionary Measures in July 2020 and the UN Special procedures recommended releasing immigrants held for processing. ICE admits that with a fragile mental and physical health, they chose to hold Mr. Daniel in Administrative Segregation from April 16, 2020 to the day he died, with a 2 days exception, when he stayed in medical segregation. The report leaves more questions than answers. There is still not an independent assessment, not a communication on the determination of the reasons Mr. Daniel died, and a lack of political will to our demands for answers. Our Senator Patty Murray response with a general recognition of a broken immigration system, and blaming Republicans for not being able to address immigration is insufficient to address the emergency¹. **Second**, we visited immigrants detained who requested to be beneficiaries of the PM and discussed with advocates the need for protection. On April 7th **Global Rights Advocacy** conducted an in person legal empowerment workshop with the incoming leadership of La Resistencia outside the detention center, to facilitate the recovery of first hand information for the Inter-American Commision and the United Nations. During that time several GEO trucks that are usually going back and forth from the inside with what we think might be cameras when supporters are outside, started doing rounds around our class held in a tent that is stationed outside (we did not take pictures to protect us). When we walked around the Center in what is called the “toxic tour” with metal recycling plants operating close to the center, GEO officers took pictures of us. We also saw a random car of Tactical Guard Services, with the sign protect, secure, defend park close (see pictures).

Furthermore, we conducted legal visits to the Center, and immigrants reported that several of our visits were not informed at all to the people we wanted to see, that they are experiencing de facto obstructions to communications and subjected to unjustified and long quarantines as an excuse to restrict their rights at the Center. On April 19th we visited 3 immigrants, [REDACTED], [REDACTED], and [REDACTED], and they are still in solitary confinement, who were witnesses of the death in custody. All expressed fear of dying or concerning thoughts that they might die alone, lack of any attention to preserve any evidence they have with their testimonies, and concerning thoughts on what they would like to do if they die. For example, Mr. [REDACTED], after being denied again to be taken to the general population, stated that *“If something happens to me, I want to be cremated. I've been thinking about how to become an organ donor because they say that someone becoming a donor can save like 15 people”*. On the other hand, after trying several times to visit [REDACTED] and being repeatedly told he was refusing our legal visits, we were able to see him to discuss his current situation on April 19th. He described that until that day and for more than 11 days in his unit all immigrants were put in “quarantine” which basically means that they are in solitary confinement in enclosed cells, instead of sleeping on the common areas of beds and have other privileges. During quarantine they are subjected to severe restrictions of movement, deprived of yard time and significant social interaction, having all activities inside the cell. He is extremely suspicious on the reasons behind the quarantines, and that they might be related to his attempt to commit suicide and the death of M. Daniel. But being in a cell is depressing and inappropriate for a suicide survivor. The 3 people visited described unexplained obstacles to communicate with La Resistencia or the outside and have founded fear of unjustified and unfail transfer, specifically doubt on denouncing because of what they have done regarding [REDACTED].

On April 26th, 2024, we visited [REDACTED], including [REDACTED], a witness of Mr. Charles Daniel's death, who previously sent information anonymously, as he expressed fear that complaining and collaborating will not help him regain his freedom, but could bring retaliation, as it happened with others.

Regarding [REDACTED] he is still struggling away from his support system, with no lawyers, and limited access to communications. We were not able to conduct a confidential legal visit yet, and partnered with an organization in Texas that might only be able to visit him next week to discuss his situation. He recently filed an appeal to keep fighting his immigration case, pro se. He called in non confidential calls from Texas where he was transferred on March 16th, and briefly discussed with La Resistencia and the press explaining his struggles and retaliation after witnessing Mr. Daniel's death. He talked to the press saying “No one from ICE was there”.

¹ See Senator Murray Response to Global Rights Advocacy.

████████ was sent to solitary confinement right after emergency services arrived at Daniel's cell on March 7, two doors away from his. He complained that "GEO Group [employees] and the police were doing the investigation, then an ICE supervisor arrived and told the police: 'When GEO gives us the report and the photos, we are going to pass them on to you,'" █████ heard. Please find attached consent forms from █████, █████ and █████.

Regarding █████ and █████, those deaths occurred before the precautionary measures were granted and they were already reported to the IACHR to describe the context, and that we are not talking about an isolated situation.

Petitions

The grave situation at the **Northwest ICE Processing Center** requires the intervention of the Inter-American Commission of human rights and following up with previous recommendations. We ask the IACHR to:

1. Issue a press release expressing concern for: 1) death in custody: 2) the poor detention conditions at the Center including a recent fire without evacuation: 3) continued use of solitary confinement as punishment and as medical isolation; 4) lack of access to information: 5) need of an independent investigation on the deaths of immigrants in custody or deported to death: 6) need to cease its policy of retaliation against detained migrants on Hunger Strikes, witnesses or whistleblowers, and to cease its policy of solitary confinement as a retaliation mechanism: 7) align detention conditions in line with the United States international human rights obligations, in line with the Mandela Rules and in line with ICE standards which are currently not being followed.
2. Send a letter immediately to the US requesting the release of the people named here to avoid the loss of life.
3. Request the US government to engage immediately with petitioners within the process of this precautionary measures and establish **an in person follow up working meeting** to discuss the individualized attention to specific named beneficiaries.
4. Request a fully independent investigation and report into detention conditions, deaths in custody, armed intervention by GEO, food, water, sanitation, family and legal visits, solitary confinement, isolation as retaliatory practices, record keeping of people detained, transfers, complaints of sexual assault, and disciplinary practices, use of discretion to release migrants most at risk during the pandemic, and other issues described on this brief.
5. Urge the Federal Government to end the contract with GEO at the NWDC immediately and close it as an effective measure of implementing the IACHR recommendations.
6. Include these concerns in the IACHR annual report.
7. Grant a bilateral meeting with the commissioner rapporteur in charge of the United States with petitioners.
8. Grant a public hearing on the precautionary measures, the next time you have a session in Washington DC.
9. Seek an invitation from the United States to conduct a site visit to conduct an independent investigation into the alleged abuses and mistreatment of immigrants held at NWIPC. Engage with the US Congresspeople.
10. Work with the Rapporteur on Economic, Social and Cultural Rights to ask the United States to demand GEO Group to respect and uphold the Inter-American Commission of Human Rights Standards on Business and Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights and act with due diligence.

Considering these concerns, we urge you to consider measures to work with the United States in shifting away from private, for-profit ICE detention centers.

Thank you for your attention to this matter,



Alejandra Gonzales
Director
Global Rights Advocacy
www.globalrightsadvocacy.org



Thomas Antkowiak Professor of Law and
Director, International Human Rights Clinic
Seattle University School of Law



Maru Mora
Villalpando
Founder
La Resistencia

Testimony of Current Conditions: Update (As of April 19th, 2024)



My name is [REDACTED] and I am 43 years old. I am an immigrant from El Salvador and I have lived in the United States since 2013. Since my last update, I did not want to use my full name since due to everything that has happened with the legal system it has been hard to trust people. I would like to send this update with my full name, due to the conditions and the detention amounting to what I believe to be punishment even though it is Civil Detention.

I have been in solitary confinement for more than 900 days, in my original testimony it was not mentioned that I have been in solitary due to not wanting to be in the General Population **because of gang threats and attacks**. My asylum claim surrounded political persecution, and I had been persecuted by the Gangs and Police Officers in El Salvador. Here in detention, when gang members enter into the system they start working together. It does not matter if they are MS-13 or 18 street, the only thing is that they work together so if you have problems with one of them you have problems with all of them. GEO put me in General Population with gang members even though I have a history of persecution from gangs, and since they work together I am always in danger in General population. I have been attacked by the gangs here in detention, and so I asked to be placed in Solitary Confinement for my own safety since GEO said that there was no way to prevent attacks, and no way to put me in a Unit without gang members. They claimed

they were unable to know who was in a gang, and therefore could not guarantee my safety. They have 21 units here, but they can't figure it out? This is their job, and they are not doing it. This is a form of punishment because forcing people to live in such an environment against their will is detrimental to their mental health and overall wellbeing. I do not get the same benefits as General population does, we only get two hours of yard time and there is nothing to do in solitary. My mental health suffers because I am in solitary, when I should be allowed to be in the General Population. **They have forced me to choose between two different things, my personal security or my mental health. They put me** in a cell for 22 hours a day, which is 60 square feet that is taken up by a bed, chair and toilet and is not enough space to adequately do anything. To give you a better understanding of how being forced to join the general population is a crucial form of retaliation that leads to irreparable harm, GEO staff constantly tries to intimidate me with having to risk my safety and personal security or to go into solitary confinement to harm my mental health with social isolation. Knowing that if I choose to join the general population of gangs they will most likely deport me and/or the gangs will physically harm me, they try to deprive me of my liberty by taking away my basic human rights to food and clothes as an inmate in solitary confinement so that I can have an incentive to choose to joining the general population of gangs. This means that very soon, I will most likely have no other choice than to join the general population and risk being assaulted and deported than to lose my mental health and basic needs in solitary confinement. It is only a matter of time of remaining in an arbitrary detention.

The conditions inside detention are worse than in State prison even though this is civil detention and not punitive detention. Here the lights are on all night, and the TV is on all night. This does not happen in prison, in prison the lights went out at night so here the conditions are worse. There is no sunlight since the walls block it off. Our yard is only 110 square feet for just 2 hours a day, and we only get to shower **3 days a week**. I think this is punishment, there are detention standards (PBNDS) that they need to follow but they don't do it. The detention conditions mandate that there needs to be the same conditions in administrative segregation (Where I am, which is not supposed to be punitive) and in the general population but we get worse treatment in solitary confinement. In addition, our tablet use for the legal software is restricted and we can only use it for 2 hours, there are also only 4 tablets for the whole segregation unit, 20 double bunked cells. In prison, there was a tablet for every person. In prison, they have better access to legal software (lexis Nexis online). In prison we also had more programs to make time go faster (recreation yard, school, educational programs), such as access to religious ceremonies and being able to work. Here you have nothing to do, cannot work and you are not allowed to go to a church or be in a religious space. You do not have the right. This is not the case in Prison.

Commissary in detention also works differently, here the cost of items is inflated. They are way cheaper in prison. Here a soup will cost you 60 cents, whereas in prison it can cost you 30 cents. We also cannot work here, so getting commissary is a lot harder and more limited as well as expensive compared to prison. This causes me frustrations here for four years (your health, mental health, your intellect); all this is against your first amendment right; I cannot even touch my wife. Washington prison allows physical contact for

couples but here we can only see people through a glass.

Testimony of Current Conditions: Update (as of April 19th, 2024)

██████████, 41 years old

My name is ██████████, I am a 41 years old immigrant from Mexico and since I began my detention at the Northwest ICE Processing Center, I have been in solitary confinement the whole time. I also did not know much about my case, I submitted a formal motion to receive my NTA (Notice to Appear) but the court sent back a document saying they did not have one available. They wouldn't tell me when my court date was, and I found out today after **3 months of waiting in Solitary** without being told when I would have a hearing, that there is an upcoming one. I want to get out of solitary, and they continue to not allow me to leave.

Since the last time I sent my testimony to the Inter-American Commission, I noticed that my communications at the NWDC have been more restricted than ever, and I do not understand why. My access to the tablet and other communications are very limited, not only limited but sometimes I have begged the guards to communicate with the outside world. In the rare instances when I do get the tablet, it ends up being low battery (20 percent) and I can't use it for very long.

I have also requested my own medical records formally from the center, and **I have not received them yet.** They haven't given me anything, I ask why and they don't explain. I have also asked to be put on the correct medication I take, and they continuously refuse. The nurse also gets my medication schedule confused, saying that I only take medication at night but from my previous incarceration I would take my medication in the morning and at night.

They still are not asking or not making any mention of Mr. Daniels. Every opportunity I get to ask, they shut it down. I am also stressed because I don't want to be moved. I don't want to be moved to Mr. Dainel's cell. **I'm also afraid they will move me like they did ██████████.** If something happens to me, I want to be cremated. I've been thinking about how to become an organ donor because they say that someone becoming a donor can save like 15 people. **I can die here alone** and my life will not have an impact. Maybe if I become an organ donor, I can save people.

Testimony of Current Conditions: Update (as of April 19th, 2024)
[REDACTED], 20 years old

My name is [REDACTED], I am an asylum seeker from India. I am 20 years old and arrived at the NWDC almost 4 months ago. Since my detention here they have continued to deny me bond and I don't know why. I've been in unit B1 since I came here with around 100 immigrants, and only one GEO officer.

Conditions since the last time we spoke have deteriorated. First, they lied to me. I was never told you tried to visit me several times. They restricted our movements further. 11 days ago my whole unit was placed in enclosed cells without being told why and without the possibility of going outside. I think it was quarantine but I was never told why, the facility was not taking any precautions, and usually the GEO officers are the ones that bring things like the COVID virus into the unit. It is weird though, because we all get placed in quarantine and they release one person, and then another the next day without any system. A guy they released early tested positive for COVID 4 days later and then they took him to quarantine for another 11 days but they released people randomly. In quarantine, we are so stressed. Because being in a single room, small room, we can't walk, we can't have some entertainment. Because there's nothing in that room, nothing. We're not able to watch TV. In quarantine we are also restricted from doctors visits, legal visits and cannot see anyone. They have not told us when the quarantine will end or what the reasons for it were. Some people were saying COVID but they kept saying it was not COVID, so if it isn't COVID why aren't they releasing us from the quarantine?

They are also running out of Cells due to the quarantine, they do not have enough space so they take some people out from the Unit and put in other people from other units into the same cells. Sometimes they transfer, unit F2 was mixed with the girls due to lack of space. Moreover, in one of the units, there is a guy who has already had three heart attacks. He's requesting them to at least evaluate him again. Yesterday also, he was having a very high heart rate and chest pain, but they are saying that he has to stay quarantined. I think if he's having pain, he should be tested. My mental health treatment is not helping. The doctor asks me questions about how I am feeling but all the doctor says is okay, perfect, perfect, perfect. They say okay and give me another meeting, or schedule it for 15 days from now. That's it, no other kind of discussion and no analysis of my mental state.